

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

NOKIA CORPORATION, )  
)  
Plaintiff, )  
)  
v. )  
)  
APPLE INC., )  
)  
Defendant. )

C.A. No. 09-791 (GMS)

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APPLE INC., )  
)  
Counterclaim Plaintiff, )  
)  
v. )  
)  
NOKIA CORPORATION and NOKIA INC., )  
)  
Counterclaim Defendants. )

**PLAINTIFF NOKIA CORPORATION’S NOTICE OF RULE 30(b)(6)  
DEPOSITION of APPLE (TOPICS 16-20)**

PLEASE TAKE NOTICE, that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Nokia Corporation will take the deposition upon oral examination of Mr. Chip Lutton as a Rule 30(b)(6) representative of Apple Inc. on topics 16-20 of Nokia’s First Notice of Deposition to Apple Inc. Pursuant to Rule 30(b)(6) served on September 17, 2010, which topics are set forth in Attachment A. The deposition will take place at the offices of Alston & Bird LLP, 275 Middlefield Road, Suite 150, Menlo Park, CA 94025-4008, on Wednesday, March 16, 2011, commencing at 9:00 AM and continuing thereafter until completed. The deposition will be taken before a certified shorthand reporter and notary public, or other officer authorized by law to administer oaths, and will be recorded by video and stenographic means. The deposition will be conducted pursuant to the provisions of the Federal

Rules of Civil Procedure and Federal Rules of Evidence for the purpose of discovery, use as evidence at trial, and any other purpose allowed by law.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Rodger D. Smith II*

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March 7, 2011

4126087

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to:

Richard L. Horwitz, Esquire  
David E. Moore, Esquire  
POTTER ANDERSON & CORROON LLP

I further certify that I caused to be served copies of the foregoing document on March 7, 2011, upon the following in the manner indicated:

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*/s/ Rodger D. Smith II*

\_\_\_\_\_  
Rodger D. Smith II (#3778)

## **ATTACHMENT A**

### **DEFINITIONS**

1. “Apple” means Apple Inc., and any of its present or former affiliates, predecessors, successors, subsidiaries (whether owned directly or indirectly), assigns, divisions and operating units thereof, employees, agents, representatives, directors, officers, and entities under common control with Apple Inc.

2. “Nokia” means Nokia Corporation and Nokia Inc, including their predecessors, successors, parents, subsidiaries (whether owned directly or indirectly), affiliates, divisions and operating units thereof, agents and entities under common control with them.

3. “Document” has the broadest meaning allowable under Federal Rule of Civil Procedure 34.

4. “Person” or “persons” shall mean an individual, corporation, proprietorship, partnership, association, or any other entity.

5. The “Apple Accused Products” shall mean the Apple iPhone, iPhone3G, iPhone 3Gs, iPhone 4.

6. “Accused Standards” shall mean 3GPP technical specifications TS 23.060, TS 25.331, TS 25.211, TS 26.090, TS 33.102, TS 44.060, TS 45.003, TS 45.008, TS 46.010 and TS 46.060, and IEEE Std. 802.11-2007 § 5 and IEEE Std. 802.11a-1999 § 17.

### **TOPICS OF EXAMINATION**

1. Apple’s licensing negotiations with Nokia.
2. Apple’s licensing negotiations with Interdigital Technology Corp. and the terms of Apple’s license agreement with Interdigital Technology Corp.

3. Apple's licensing negotiations with SPH America LLC, WiAV Solutions LLC and WiAV Networks LLC and the terms of Apple's license agreements with SPH America LLC, WiAV Solutions LLC and WiAV Networks LLC.

4. Apple's licensing negotiations with Telefonaktiebolaget LM Ericsson and the terms of Apple's license agreements with Telefonaktiebolaget LM Ericsson.

5. Apple's licensing negotiations with Voiceage Corporation and the terms of Apple's license agreements with Voiceage Corporation.