

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

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

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 1-13, 15)**

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. Tito Thomas as a Rule 30(b)(6) representative of Apple Inc. on topics 1-13 and 15 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 Tuesday, March 22, 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

Jack B. Blumenfeld (#1014)

Rodger D. Smith II (#3778)

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899

(302) 658-9200

jblumenfeld@mnat.com

rsmith@mnat.com

*Attorneys for Nokia Corporation and
Nokia Inc.*

OF COUNSEL:

Patrick J. Flinn

Peter Kontio

John D. Haynes

Mark A. McCarty

Adam J. Biegel

ALSTON & BIRD LLP

One Atlantic Center

1201 West Peachtree Street

Atlanta, GA 30309

(404) 881-7000

March 7, 2011

4126034

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:

Richard L. Horwitz, Esquire
David E. Moore, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza – 6th Floor
1313 North Market Street
Wilmington, DE 19801

VIA ELECTRONIC MAIL

William F. Lee, Esquire
Mark D. Selwyn, Esquire
WILMERHALE
60 State Street
Boston, MA 02109

VIA ELECTRONIC MAIL

Nina S. Tallon, Esquire
Joseph J. Mueller, Esquire
WILMERHALE
1875 Pennsylvania Avenue, NW
Washington, DC 20006

VIA ELECTRONIC MAIL

Kenneth H. Bridges, Esquire
Michael T. Pieja, Esquire
Brian C. Kwok, Esquire
BRIDGES & MAVRAKAKIS LLP
540 Cowper Street
Palo Alto, CA 94301

VIA ELECTRONIC MAIL

/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. How the Apple Accused Products implement 3GPP TS 23.060 technical specification.

2. How the Apple Accused Products implement 3GPP TS 25.331 technical specification.

3. How the Apple Accused Products implement 3GPP TS 25.211 technical specification.
4. How the Apple Accused Products implement 3GPP TS 26.090 technical specification.
5. How the Apple Accused Products implement 3GPP TS 33.102 technical specification.
6. How the Apple Accused Products implement 3GPP TS 44.060 technical specification.
7. How the Apple Accused Products implement 3GPP TS 45.003 technical specification.
8. How the Apple Accused Products implement 3GPP TS 45.008 technical specification.
9. How the Apple Accused Products implement 3GPP TS 46.010 technical specification.
10. How the Apple Accused Products implement 3GPP TS 46.060 technical specification.
11. How the Apple Accused Products implement IEEE Std. 802.11-2007 § 5.
12. How the Apple Accused Products implement IEEE Std. 802.11a-1999 § 17.
13. The identity of documents that show how the Apple Accused Products implement the Accused Standards.
15. The identity of all persons knowledgeable about how Apple implements the Accused Standards on the Apple Accused Products or will implement on any future devices.