

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NOKIA CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 09-791-GMS
)	
APPLE INC.,)	JURY TRIAL DEMANDED
)	
Defendant.)	
<hr style="border: 0.5px solid black;"/>		
APPLE INC.)	
)	
Counterclaim-Plaintiff,)	
)	
v.)	
)	
NOKIA CORPORATION and NOKIA INC.)	
)	
Counterclaim-Defendants.)	

NOTICE OF SUBPOENA

PLEASE TAKE NOTICE that, pursuant to Rule 45 of the Federal Rules of Civil Procedure, defendant Apple Inc. has served the attached subpoena (Exhibit 1), in the above-referenced action.

OF COUNSEL:

Doc. 386

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Dated: May 31, 2011
1014866 / 35035

EXHIBIT 1

Issued by the
**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF COLUMBIA**

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

**SUBPOENA TO PRODUCE
 DOCUMENTS, INFORMATION, AND
 OBJECTS IN A CIVIL ACTION**
 CASE 09-791-GMS
 NUMBER:¹

TO: Johanna Pekonen

United States District Court
 District of Delaware

YOU ARE COMMANDED to appear in the United States District Court at the place, date and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below:

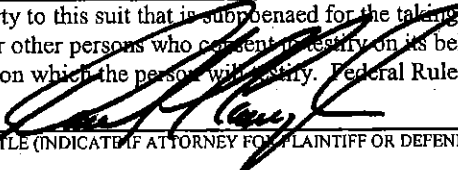
Please see Attachment A, attached hereto.

PLACE Wilmer, Cutler, Pickering, Hale and Dorr LLP, c/o David L. Cavanaugh 1875 Pennsylvania Avenue NW, Washington, D.C. 20006	DATE AND TIME June 10, 2011
--	--------------------------------

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  Attorney for Defendant	DATE May 27, 2011
--	----------------------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER David L. Cavanaugh, Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Ave. NW, Washington, D.C. 20006 (202) 663-6000 david.cavanaugh@wilmerhale.com

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE	PLACE
SERVED: May 27, 2011	Wilmer, Cutler, Pickering, Hale and Dorr LLP 1875 Pennsylvania Avenue NW, Washington, DC 20006
SERVED ON (PRINT NAME) Johanna Pekonen	MANNER OF SERVICE Hand
SERVED BY (PRINT NAME) David L. Cavanaugh, Esq.	TITLE Attorney for Defendant

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

May 27, 2011
DATE

SIGNATURE OF SERVER

Wilmer, Cutler, Pickering, Hale and Dorr, LLP,
1875 Pennsylvania Avenue NW, Washington, D.C. 20006
ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to comply production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance,
- (ii) requires a person who is not a party or an officer of a

party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

ATTACHMENT A

DEFINITIONS

The following definitions are applicable herein:

1. "The '672 Patent" means United States Patent No. 7,092,672, issued on August 15, 2006, and entitled "Reporting Cell Measurement Results in a Cellular Communication System," and any foreign counterparts.
2. "3GPP" means the Third Generation Partnership Project.
3. "Any," "all," and "each" shall be construed as each and every.
4. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
5. "Concerning" means relating to, referring to, describing, evidencing, referencing, discussing, or constituting.
6. "Document" and/or "Thing" has the broadest definition of document under the Federal Rules of Civil Procedure and the cases interpreting those rules, and includes all tangible things, all originals (or, if originals are not available, identical copies thereof), all non-identical copies of a document, all drafts of final documents, all other written, printed, or recorded matter of any kind, and all other data compilations from which information can be obtained and translated if necessary, that are or have been in your actual or constructive possession, custody or control, regardless of the medium on which they are produced, reproduced, or stored (including without limitation computer programs and files containing any requested information), and any recording or writing, as these terms are defined in Rule 1001 of the Federal Rules of Evidence. Any document bearing marks, including without limitation, initials, stamped initials, comments,

or notations not a part of the original text or photographic reproduction thereof, is a separate document.

7. "EDGE" means Enhanced Data Rates for GSM Evolution.

8. "EIA" means Electronic Industries Alliance.

9. "Entity" or "Entities" includes natural Persons, proprietorships, partnerships, firms, corporations, public corporations, municipal corporations, governments, including foreign national governments, the government of the United States or any state or local government, and all departments and agencies thereof, political subdivisions, groups, associations, or organizations.

10. "Essential" means necessary for implementation of any Wireless Standard such that the standard, or some part of the standard, could not be practiced without infringing the patent claim or technology to which "essential" refers.

11. "ETSI" means the European Telecommunications Standards Institute.

12. "GPRS" means GSM Packet Radio Services.

13. "GSM" means Global System for Mobile communications.

14. "Identify," when referring to a person, means to give, to the extent known, the person's full name, present or last known address and when referring to a natural person, additionally, the present or last known place of employment. When referring to documents, "identify" means to give, to the extent known, the (i) type of document, (ii) general subject matter, (iii) date of the document, (iv) author(s), addressee(s), and recipient(s).

15. "IPR" means intellectual property rights, including patents and patent applications.

16. "IS-54" means EIA/TIA Interim Standard – Cellular System Dual-Mode Mobile Station-Base Station Compatibility Standard IS-54.

17. "IS-95A" means EIA/TIA Mobile Station-Base Station Compatibility Standard for Dual Mode Wideband Spread Spectrum Cellular System Standard IS-95A.

18. "IS-95" means EIA/TIA Mobile Station-Base Station Compatibility Standard for Dual-Mode Wideband Spread Spectrum Cellular System IS-95.

19. "Nokia" means plaintiff Nokia Corporation and includes, without limitation, each of its predecessors, present or former parents, subsidiaries, divisions, affiliated or controlled companies or joint ventures, its respective current or former directors, officers, employees, agents, attorneys, accountants and any other person who acted or purported to act on their or any of their behalf.

20. "NSN" means Nokia Siemens Networks and includes, without limitation, each of its predecessors, present or former parents, subsidiaries, affiliated or controlled companies or joint ventures, including without limitation, Nokia Corporation and Siemens AG.

21. "Patent" or "Patents" means the '672 Patent, and any foreign counterparts.

22. "Person" means any natural person, legal entity, governmental entity, or business entity, including without limitation any corporation, partnership, unincorporated association, joint venture, sole proprietorship, or any and/or all other organizations or groups of individuals together with the employees, agents, consultants, and attorneys thereof.

23. "Related Patents" means all patents and patent applications (whether rejected, abandoned, or pending) in any country of the world (a) to which the '672 Patent or its corresponding patent applications directly or indirectly claim priority or (b) that, directly or indirectly, claim priority to the '672 Patent or its corresponding patent applications.

24. "Relating to" means, without limitation, concerning, alluding to, referring to, constituting, describing, discussing, evidencing, or regarding.
25. "Standards Setting Organization" or "SSO" means an organization that adopts standards governing an industry or technological field, and includes without limitation, ETSI, 3GPP, EIA, and TIA.
26. "Technology" means any software, apparatus, hardware, or method.
27. "The Litigation" means and refers to the above-referenced action, entitled *Nokia Corporation v. Apple Inc., et al.*, C.A. 09-791-GMS.
28. "TIA" means Telecommunications Industry Association.
29. "UMTS" means Universal Mobile Telecommunications System.
30. "Wireless Standard" means each of the following standards: (i) the following ETSI and 3GPP standards: (1) GSM; (2) GPRS; (3) EDGE; and (4) UMTS; and (ii) the following EIA/TIA standards: (1) IS-54; (2) IS-95; and (3) IS-95A.
31. The words "and" and "or" shall be construed conjunctively or disjunctively, whichever makes this subpoena more inclusive.
32. The use of the singular form of any word shall be treated as inclusive of the plural, and the use of the plural form of any word shall be treated as inclusive of the singular.

INSTRUCTIONS

The following instructions are applicable herein:

1. Produce all responsive documents and things in your possession, custody, or control.
2. Produce all documents and things requested in the same file or manner in which they are kept in the usual course of business.
3. Provide the following information for any responsive document or thing withheld from production on the grounds that it is protected from disclosure by the attorney-client privilege, the work product doctrine, or any other relevant privilege:
 - a. The author of the document;
 - b. The person(s) for whom the document was prepared, to whom it was sent, or who received copies;
 - c. The date of the document;
 - d. The subject matter of the document;
 - e. The type of document (e.g., letter, memorandum, note, report, etc.)
 - f. The number of pages and attachments; and
 - g. The nature and the basis for the claim of privilege.
4. This subpoena includes documents that exist in electronic form (including electronic mail, back-up tapes, magnetic tapes, and diskettes).
5. More than one paragraph of this request may ask for the same documents. The presence of such duplication is not to be interpreted to narrow or limit the normal interpretation placed upon each individual request. Where a writing is requested in more than one numbered paragraph, only one copy of it need be produced.
6. If you object to a request, or any part of a request, produce all documents to which your objection does not apply.

7. In the event that multiple copies of a document exist, produce every copy on which appear any notations or marking of any sort not appearing on any other copy.

8. If you are aware of a document or thing, or group of documents or things, that once existed but has been destroyed or discarded since May 1995, you are requested to state the type of document or thing or group of documents or things, the date it was created, the date it was destroyed or discarded, and the identity of the persons having knowledge of the contents of the document or thing, or group of documents and things.

9. A copy of the Protective Order entered in this case is attached.

DOCUMENT REQUESTS

Document Request No. 1

All documents concerning the conception and/or reduction to practice—whether actual or constructive—of the subject matter of each claim of the '672 patent or any Related Patents. This includes, without limitation, invention disclosures, notebooks, memoranda, reports, journals, drawings, schematics, specifications, diagrams, computer records, diaries, calendars, test results, and patent prosecution records.

Document Request No. 2

To the extent not duplicative of other requests, all documents relating to any work, research, tests, experiments, studies, or prototypes, whether complete, incomplete, or prematurely terminated, undertaken by any person, relating to the alleged invention claimed in the '672 patent or any Related Patents.

Document Request No. 3

To the extent not duplicative of other requests, all documents concerning information received by you from another inventor of the '672 patent or any Related Patents, or given by you to another inventor of the '672 patent or any Related Patents, concerning the subject matter of any claim of the '672 Patent and/or any Related Patents.

Document Request No. 4

To the extent not duplicative of other requests, all documents concerning communications between or among any combination of the following: You, another Inventor, Nokia, and/or NSN concerning (a) the '672 patent or any Related Patents; (b) the application for the '672 patent or any Related Patents; or (c) the subject matter of any claim of the '672 patent or any Related Patents.

Document Request No. 5

To the extent not duplicative of other requests, all documents concerning communications between you and any other person regarding (a) the '672 patent or any Related Patents; (b) the application for the '672 patent or any Related Patents; or (c) the subject matter of any claim of the '672 patent or any Related Patents.

Document Request No. 6

To the extent not duplicative of other requests, all documents concerning the preparation, filing, or prosecution of the applications for the '672 patent and any Related Patents. This includes without limitation (a) all correspondence, memoranda, notes, and other documents relating to the prosecution thereof; (b) all inventions disclosures, engineering/lab notebooks, journals, declarations, correspondence, notes, testing results, and/or other documents relating to any work underlying the alleged inventions claimed in the '672 patent or any Related Patents.

Document Request No. 7

To the extent not duplicative of other requests, all documents concerning any communications, meeting, or other contact with the US Patent and Trademark Office, or any foreign patent office concerning the '672 patent and/or any Related Patents.

Document Request No. 8

To the extent not duplicative of other requests, all documents concerning the identification or determination of the inventors for the '672 patent and any Related Patents.

Document Request No. 9

To the extent not duplicative of other requests, all documents concerning any ownership, right, title, or interest to the '672 patent or any Related Patents, including without limitation any payment for, transfer, or assignment thereof.

Document Request No. 10

To the extent not duplicative of other requests, all documents concerning Nokia's decision to seek patent protection for the subject matter of any claim of the '672 patent or any Related Patents.

Document Request No. 11

To the extent not duplicative of other requests, all documents relating to any mode of practicing any claim of the '672 Patent, including, without limitation, the best mode. This includes, without limitation, modes contemplated by an Inventor at or before the time of filing the patent application that led to the '672 patent or any Related Patents.

Document Request No. 12

To the extent not duplicative of other requests, all documents concerning the research, design, development, operation, manufacture, assembly, testing, marketing, offer for sale, or sale of any product that allegedly embodies—or whose use allegedly embodies—any claim of the '672 patent or any Related Patents.

Document Request No. 13

To the extent not duplicative of other requests, all documents relating to the first disclosure to any person of the subject matter of each claim of the '672 patent or any Related Patents.

Document Request No. 14

To the extent not duplicative of other requests, all documents relating to the first public disclosure to any person of the subject matter of each claim of the '672 patent or any Related Patents.

Document Request No. 15

To the extent not duplicative of other requests, all documents relating to the first public written description, first public use, first public demonstration, first offer to sell, or first sale of the invention claimed in the '672 patent, or of any embodiment thereof.

Document Request No. 16

To the extent not duplicative of other requests, all documents concerning funding for the work underlying the '672 patent and any Related Patents, including without limitation all communications, agreements, proposals, status reports, test results, research reports, literature reviews, requests for funding, and funding documentation.

Document Request No. 17

To the extent not duplicative of other requests, all documents authored, presented, or published (in whole or part) by or on behalf of any Inventor concerning the subject matter of any claim of the '672 patent or any Related Patents. This includes without limitation articles, publications, internal memoranda, and reports.

Document Request No. 18

To the extent not duplicative of other requests, all documents concerning any analysis, opinion, or inquiry regarding the '672 patent and any Related Patents. This includes without limitation all documents concerning the ownership, inventorship, patentability, validity, enforceability, or infringement of each claim of the '672 Patent, including, without limitation, any documents created or discovered in connection with any prior art search and/or relating to pre-litigation investigations performed by or on behalf of Nokia or an Inventor.

Document Request No. 19

To the extent not duplicative of other requests, all documents concerning prior art or potential prior art to the '672 patent or any Related Patents, including, without limitation, any prior art asserted against the '672 patent or any Related Patents in any proceeding or brought to your attention by any person.

Document Request No. 20

To the extent not duplicative of other requests, all documents concerning any effort to search for, identify, locate, collect, review, analyze, or otherwise obtain evidence of prior art with respect to the '672 patent or any Related Patents, including without limitation any literature, patents, publication, or prior art searches.

Document Request No. 21

To the extent not duplicative of other requests, all documents created on or before December 21, 2001, concerning measurement reporting in a cellular network.

Document Request No. 22

To the extent not duplicative of other requests, all documents concerning extended measurement reporting, enhanced measurement reporting, supplementary/polling (S/P) bits, and extended supplementary/polling (ES/P).

Document Request No. 23

To the extent not duplicative of other requests, all documents concerning Nokia's IPR declarations relating to measurement reporting, extended measurement reporting, enhanced measurement reporting, supplementary/polling (S/P) bits, extended supplementary/polling (ES/P), including, without limitation, documents concerning what patents to declare essential (or not declare essential).

Document Request No. 24

To the extent not duplicative of other requests, all documents relating to the design, engineering, and operation of a mobile telephone's preparation of a measurement report without including identification parameters of the cells. This includes, without limitation, preparation of an extended measurement report as defined by at least section 8.4.6 of the GSM 05.08 standard and at least sections 3.4.1.3, 9.1.51, and 10.5.2.46 of the GSM 04.18 standard, and preparation of an enhanced measurement report as defined by at least section 8.4.8 of 3GPP TS 45.008.

Document Request No. 25

To the extent not duplicative of other requests, all documents concerning the adoption of any standard or technical specification related to measurement reporting. This includes without limitation at least the following 3GPP Technical Specifications: (1) 04.08 and 24.008; (2) 04.18 and 44.018; and (3) 05.08 and 45.008, as well as any standard or technical specification that is a predecessor or successor to those listed. This also includes, without limitation, documents, including drafts and revisions, related to submissions to, proposals to, communications with, presentations to, or participation in any Standards Setting Organization or meeting by any Person. This also includes without limitation any documents concerning any proposed or candidate technologies that were proposed but not adopted.

Document Request No. 26

To the extent not duplicative of other requests, all documents concerning Nokia's participation in ETSI meetings relating to measurement reporting, including without limitation the below-listed meetings:

- a. ETSI STC SMG2 Meeting No. 32 (Sept. 20-24, 1999, Bordeaux, France)
- b. SMG2 WPB Meeting No. 11 (Nov. 23-25, 1999, Sophia Antipolis, France)
- c. SMG2 Plenary Meeting #33 (Nov. 22-26, 1999, Sophia Antipolis, France)

- d. ETSI SMG2 Working Session on EDGE No. 12 (Dec. 13-16, 1999, Amsterdam, The Netherlands)
- e. SMG2 WPA Meeting (Jan. 11, 2000, Aalborg, Denmark)
- f. SMG2 WPB Meeting No. 12 (Jan. 11-13, 2000, Aalborg, Denmark)
- g. SMG2 Plenary Meeting No. 34 (Jan. 10-14, 2000, Aalborg, Denmark)
- h. SMG Plenary Meeting No. 31 (Feb. 14-16, 2000, Brussels, Belgium)
- i. SMG2 WPA at SMG2 No. 35 (April 4-6, 2000, Schaumburg, Illinois, U.S.A.)
- j. SMG2 WPB No. 35 at SMG2 No. 35 (Apr. 4-6, 2000, Schaumburg, Illinois, U.S.A.)
- k. SMG2 Meeting No. 35 (Apr. 3-7, 2000, Schaumburg, Illinois, U.S.A.)
- l. ETSI SMG Meeting No. 31b (Apr. 17, 2000, Frankfurt, Germany)

Document Request No. 27

To the extent not duplicative of other requests, all documents created on or before December 21, 2001, relating to a request by a cellular network for a mobile station (including, for example, a cell phone) to take measurements of surrounding cell conditions (including, for example, signal levels (power) between the receiving and transmitting stations, quality of the signal, distance between the stations, amount of transmitted data, etc.). This includes, without limitation, a network request for a mobile station to take measurements in accordance with (1) the extended measurement report feature defined by at least section 8.4.6 of the GSM 05.08 standard and at least sections 3.4.1.3, 9.1.51 and 10.5.2.46 of the GSM 04.18 standard; and (2) the enhanced measurement report feature defined by at least section 8.4.8 of 3GPP TS 45.008.

Document Request No. 28

To the extent not duplicative of other requests, all documents relating to the design, engineering, and/or operation of a mobile telephone's response to a measurement report request from a network with a measurement report.

Document Request No. 29

To the extent not duplicative of other requests, all documents concerning notice of the '672 patent and any Related Patents provided to Apple or any other alleged or potential infringer.

Document Request No. 30

To the extent not duplicative of other requests, all documents concerning: (1) any product, instrumentality, or process accused of infringing the '672 patent and any Related Patents, including without limitation all documents constituting or concerning: (a) the infringement or non-infringement of the '672 patent and any Related Patents by Apple or any other Person; (b) any investigation, examination, study, report, reverse engineering, examination, inspection, survey, critique or analysis; and (c) how and when you, any of the Inventors, or Nokia first became aware of the existence of said product, instrumentality, or process.

Document Request No. 31

To the extent not duplicative of other requests, all documents concerning communications between Nokia or an Inventor on the one hand, and Apple on the other hand.

Document Request No. 32

To the extent not duplicative of previous requests, all documents concerning Apple or any Apple product.

Document Request No. 33

To the extent not duplicative of previous requests, all documents concerning agreements or negotiations relating to the '672 patent or any Related Patents, including, without limitation, licenses, license negotiations, draft license agreements, licensing correspondence, sublicenses, offers for licenses or sublicenses, demand letters, covenants not to sue, or settlement agreements, whether ultimately consummated or not.

Document Request No. 34

To the extent not duplicative of other requests, all documents concerning any valuation or attempt to assign a value to the '672 patent or any Related Patents.

Document Request No. 35

To the extent not duplicative of previous requests, all documents concerning any and all licensing customs, practices, or policies of Nokia.

Document Request No. 36

To the extent not duplicative of previous requests, all documents concerning analysis, interpretation, or discussion of whether any Nokia patent was essential to any Defined Wireless Standard.

Document Request No. 37

To the extent not duplicative of previous requests, all documents concerning the valuation or attempt to assign a value to an essential patent or potentially essential patent to any Defined Wireless Standard.

Document Request No. 38

To the extent not duplicative of previous requests, all documents concerning participation by Nokia in, or with, any Standards Setting Organization.

Document Request No. 39

To the extent not duplicative of previous requests, all documents concerning the '672 patent or any Related Patents.

Document Request No. 40

To the extent not duplicative of previous requests, all documents concerning the transfer or destruction of any of the documents requested by any of the foregoing requests.

Document Request No. 41

To the extent not duplicative of previous requests, all documents concerning the document retention or document destruction policies of Nokia, whether formal or informal.

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

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

C.A. 09-791-GMS

JURY TRIAL DEMANDED

Agreement To Be Bound By Protective Order

I have read and understand the terms and restrictions of the Joint Protective Order entered in the above-captioned action by the Court. I understand the provisions of the Joint Protective Order, and I understand the responsibilities and obligations the Joint Protective Order imposes on persons viewing the litigation material which is subject to the Joint Protective Order (the "Protected Material"). I understand that any violation of the terms of the Joint Protective Order may constitute contempt of a court order. In accordance with the Joint Protective Order, so as to permit me to view the Protected Material, or produce the Protected Material, which is subject to the Joint Protective Order, I hereby agree to be bound by all of its provisions and terms, and I

hereby submit to the jurisdiction of the District Court for the District of Delaware for the purposes of enforcement of the Joint Protective Order.

I shall not use or disclose to others, except in accordance with the Joint Protective Order, any Protected Material. I understand that, if I fail to abide by the terms of the Joint Protective Order, I may be subject to sanctions by way of contempt of Court, separate legal and equitable recourse by the adversely affected Producing Party, or other appropriate relief.

Dated: _____

By: _____
Name: _____
Title: _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on May 31, 2011, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I hereby certify that on May 31, 2011, the attached document was electronically mailed to the following person(s)

VIA ELECTRONIC MAIL

Jack B. Blumenfeld
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/s/ David E. Moore
Richard L. Horwitz
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dmoore@potteranderson.com

941557/35035