

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NOKIA CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 09-791 (GMS)
)	
APPLE INC.,)	
)	
Defendant.)	

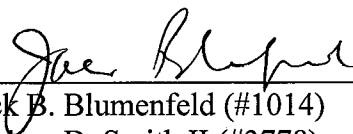
**NOKIA CORPORATION’S MOTION
FOR LEAVE TO AMEND COMPLAINT**

Plaintiff Nokia Corporation (“Nokia”), pursuant to Federal Rule of Civil Procedure 15(a) and D. Del. LR 15.1, moves the Court for leave to file its First Amended Complaint. Nokia amends its Complaint to assert new claims against Apple Inc. (“Apple”) based on Apple’s infringement of three of Nokia’s implementation patents, and based on Apple’s repudiation of the benefit of Nokia’s F/RAND commitment.

Nokia brings this Motion in advance of the Scheduling Order’s August 30, 2010 deadline for amendments to pleadings. Accordingly, and for other good cause as set forth more fully in its accompanying Opening Brief, Nokia respectfully requests that its motion be granted.

Pursuant to D. Del. LR 15.1, Nokia attaches a copy of its proposed First Amended Complaint and copies of the First Amended Complaint indicating in what respects it differs from Nokia’s original Complaint (Exhibits “1,” “2,” respectively).

MORRIS, NICHOLS, ARSHT & TUNNELL LLP



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.*

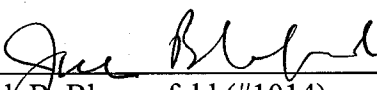
OF COUNSEL:

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

July 1, 2010

RULE 7.1.1 CERTIFICATION

Pursuant to Local Rule 7.1.1, I certify that the subject of this motion has been raised with counsel for Apple and that the parties have not reached agreement at this time.



Jack B. Blumenfeld (#1014)

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2010, 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 July 1, 2010, 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

Kenneth H. Bridges, Esquire
Michael T. Pieja, Esquire
WONG, CABELLO, LUTSCH, RUTHERFORD
& BRUCCULERI, LLP
540 Cowper Street
Palo Alto, CA 94301

VIA ELECTRONIC MAIL



Jack B. Blumenfeld (#1014)