

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

**DEFENDANT AND COUNTERCLAIM PLAINTIFF APPLE INC.'S FIRST RULE
30(B)(6) NOTICE OF DEPOSITION TO PLAINTIFF AND COUNTERCLAIM
DEFENDANTS NOKIA CORPORATION AND NOKIA INC.**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, defendant and counterclaim plaintiff Apple Inc. will take the deposition of plaintiff and counterclaim defendants Nokia Corporation and Nokia Inc. (collectively, "Nokia") commencing on September 20, 2010 at 9:00 a.m. at the offices of Wilmer Cutler Pickering Hale and Dorr LLP, 950 Page Mill Road, Palo Alto, California, 94304, and continuing day-to-day until completed, weekends and holidays excepted.

Nokia is required to designate, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, one or more of its officers, directors or managing agents, or other persons with knowledge of the matters set forth in Attachment A of this notice to appear and testify on its behalf at the deposition. The persons so designated shall testify as to matters known or

reasonably available to Nokia. Nokia is requested to provide Apple's counsel, as soon as reasonably possible, but no later than ten (10) business days before the deposition, written notice of the following: (a) the name and employment position of each designee who has consented to testify on behalf of Nokia in response to this Notice, and (b) all matters set forth below as to which each such designee has agreed to testify on behalf of Nokia.

The examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and by video. Real-time transcription (e.g., LiveNote) may be used as well. Testimony derived pursuant to this Notice of Deposition shall be used for any and all appropriate purposes permitted by the Federal Rules of Evidence.

You are invited to attend and cross-examine.

OF COUNSEL:

William F. Lee
WILMERHALE
60 State Street
Boston, MA 02109
Tel: 617 526 6000

Mark D. Selwyn
WILMERHALE
950 Page Mill Road
Palo Alto, CA 94304
Tel: (650) 858-6000

Kenneth H. Bridges
Michael T. Pieja
WONG CABELLO
540 Cowper Street, Suite 100
Palo Alto, CA
Tel: (650) 681-4475

Dated: August 23, 2010
979619 / 35035

POTTER ANDERSON & CORROON LLP

By: /s/ Richard L. Horwitz
Richard L. Horwitz (#2246)
David E. Moore (#3983)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19899
Tel: (302) 984-6000
rhoorwitz@potteranderson.com
dmoore@potteranderson.com

*Attorneys for Defendant/Counterclaim-Plaintiff
Apple Inc.*

ATTACHMENT A

DEFINITIONS

1. "Nokia," "you," and "your" shall each mean and refer to plaintiff and counterclaim defendants Nokia Corporation and Nokia Inc., including without limitation all of their predecessors, predecessors-in-interest, subsidiaries, parents, and affiliates, and all past or present directors, officers, agents, representatives, employees, and consultants.
2. "Apple" shall mean defendant and counterclaim plaintiff Apple Inc.
3. "The '703 Patent" shall mean U.S. Patent No. 5,315,703, issued on May 24, 1994, and entitled "Object-Oriented Notification Framework System," and all foreign counterparts thereof.
4. "The '854 Patent" shall mean U.S. Patent No. 5,455,854, issued on October 3, 1995, and entitled "Object-Oriented Telephony System," and all foreign counterparts thereof.
5. "The '369 Patent" shall mean U.S. Patent No. 5,555,369, issued on September 10, 1996, and entitled "Method Of Creating Packages For A Pointer-Based Computer System," and all foreign counterparts thereof.
6. "The '074 Patent" shall mean U.S. Patent No. 5,634,074, issued on May 27, 1997, and entitled "Serial I/O Device Identifies Itself To A Computer Through A Serial Interface During Power On Reset Then It Is Being Configured By The Computer," and all foreign counterparts thereof.
7. "The '105 Patent" shall mean U.S. Patent No. 5,848,105, issued on December 8, 1998, and entitled "GMSK Signal Processors For Improved Communications Capacity And Quality," and all foreign counterparts thereof.

8. “The ‘034 Patent” shall mean U.S. Patent No. 6,189,034 B1, issued on February 13, 2001, and entitled “Method And Apparatus For Dynamic Launching Of A Teleconferencing Application Upon Receipt Of A Call,” and all foreign counterparts thereof.

9. “The ‘795 Patent” shall mean U.S. Patent No. 6,239,795 B1, issued on May 29, 2001, and entitled “Pattern And Color Abstraction In A Graphical User Interface,” and all foreign counterparts thereof.

10. “The ‘453 Patent” shall mean U.S. Patent No. 7,383,453 B2, issued on June 3, 2008, and entitled “Conserving Power By Reducing Voltage Supplied To An Instruction-Processing Portion Of A Processor,” and all foreign counterparts thereof.

11. “The ‘381 Patent” shall mean U.S. Patent No. 7,469,381 B2, issued on December 23, 2008, and entitled “List Scrolling And Document Translation, Scaling, And Rotation On A Touch-Screen Display,” and all foreign counterparts thereof.

12. “Apple Patents-In-Suit” shall mean the ‘703 Patent, the ‘854 Patent, the ‘369 Patent, the ‘074 Patent, the ‘105 Patent, the ‘034 Patent, the ‘795 Patent, the ‘453 Patent, and the ‘381 Patent, individually and collectively.

13. “Product” shall mean a machine, manufacture, apparatus, device, instrument, mechanism, appliance, or an assemblage of components/parts (either individually or collectively) that are designed to function together electrically, mechanically, chemically, or otherwise, including any of the foregoing offered for sale, sold, or under development.

14. “Apple Product” shall mean any Product designed, developed, tested, made, used, demonstrated, imported into the United States, offered for sale, or sold by Apple.

15. “Accused Apple Product” shall mean any Product made or marketed by or on behalf of Apple that, when made, used, offered for sale, sold, imported, or otherwise practiced in

the United States (either by itself or in combination with other devices, methods) by or on behalf of Apple or any user, allegedly constitutes, practices, incorporates, or embodies a device, or method claimed in one or more of the Nokia Patents-in-Suit. This definition includes without limitation any Apple Product that is accused of directly or indirectly infringing one or more of the Nokia Patents-in-Suit, including the iPhone, iPhone 3G, and iPhone 3GS.

16. "Mobile Wireless Telecommunications Device" shall mean any device capable of transmitting and receiving cellular telephonic communications.

17. "Nokia Accused Product" shall mean any past, present, or future Nokia Product that relates to any technology claimed in the Apple Patents-In-Suit. Nokia Accused Products specifically include, but are not limited to: (a) Products that use Single Antenna Interference Cancellation ("SAIC"); (b) Products that perform filtering of Gaussian Minimum-Shift Keyed ("GMSK") signals; (c) Products with touch screen capabilities, including without limitation, Products that permit scrolling of an electronic document on a touch-screen and Products that are capable of displaying an area beyond the edge of the electronic document after the edge of the electronic document has been reached, including but not limited to the N900; (d) Products that allow the user interface theme to be modified, including but not limited to the E71, N97, N900, 5310 XpressMusic, 5530 XpressMusic, 5610 XpressMusic, 5730 XpressMusic, 5800 XpressMusic; (e) user interface themes distributed by Nokia, including but not limited to user interface themes distributed through Nokia's Ovi store; (f) Products that use the Java Push Registry to enable SMS Text Messaging and/or Instant Messaging, including but not limited to the E71; (g) Products that launch an application in response to receiving an external message, including but not limited to the E71; (h) Products that support Universal Serial Bus ("USB") functionalities, including but not limited to the 5310 XpressMusic, 5530 XpressMusic, 5610

XpressMusic, 5730 XpressMusic, 5800 XpressMusic, 6210 Navigator, 6555, N81, N81 8GB, N82, 3600, 6205, 7610 Supernova, E66, E71, N79, N85, E63, 7205 Intrigue, E71x, E75, 1006, N86 8MP, N97, E72, 3711, 6790, N97 mini, N900, 6350, N810, 3300, 6086, 6126, 6230, 6670, 7270, 7610, 9500, N70, N71, N72, N73, N80, N93, 3100, 5100, 5140, 6100, 6610, 6800, 6820, 6822, Nokia Connectivity Adapter AD-73, and Nokia Booklet 3G; (i) Products that contain an ARM Cortex-A5 Series processor, ARM Cortex-A8 Series processor, ARM Cortex-A9 Series processor or an ARM11 processor, including but not limited to the N97, N95-3 NAM, N97 mini, X6, E72, N82, N95, N93, 5800 XpressMusic, N85, 6700, N810, N900, E90, N76, N93, E71, and 6290; (j) Products that utilize the Symbian operating system (“OS”), including but not limited to the 7650, 3600, 3620, 3650, 3660, N-Gage, N-Gage QD, 6600, 3230, 6260, 6620, 6670, 7610, 6630, 6680, 6681, 6682, N70, N72, N90, 3250, 5500 Sport, E50, E60, E61, E61i, E62, E65, E70, N71, N73, N75, N77, N80, N91, N91 8GB, N92, N93, N93i, 5700 XpressMusic, 6110 Navigator, 6120, 6121, 6124, 6290, E51, E63, E66, E71, E90 Communicator, N76, N81, N81 8GB, N82, N95, N95 8GB, 5230 XpressMusic, 5630 XpressMusic, 5730 XpressMusic, 6210, 6220, 6650, 6710 Navigator, 6720, 6730, 6760, 6790 Surge, E52, E55, E71x, E72, E75, N78, N79, N85, N86 8MP, N96, 5800 XpressMusic, 5800 Navigation Edition, 5530 XpressMusic, 5230, N97, N97 mini, X6, 7710, 9210, 9300, and 9500; (k) Products that include applications developed, in part, through the use of Carbide C++, including but not limited to the N97, N97 mini, N900, 5530 XpressMusic, 5800 XpressMusic, N79, N85, N86 8MP, E63, E66, E71, E71x, E72, E75, 7705, 7610, 7510, 7205, 5800 XpressMusic, 5800 Navigation Edition, 5730 XpressMusic, 5610 XpressMusic, 5530 XpressMusic, 5310 XpressMusic, 3711, 3600, 2705, n-Gage, n-Gage XD, 3230, 3250, 3620, 3650, 3660, 5230 XpressMusic, 5500 Sport, 5630 XpressMusic, 5700 XpressMusic, 6110 Navigator, 6120, 6121, 6124, 6210, 6220, 6260, 6600,

6620, 6630, 6650, 6670, 6680, 6681, 6682, 6710 Navigator, 6720, 6730, 6760, 6790 Surge, 7610, 7650, 7710, 9210, 9300, 9500, E50, E60, E61, E61i, E62, E65, E70, N70, N71, N72, N73, N75, N76, N77, N78, N80, N81, N81 8GB, N82, N90, N91, N91 8GB, N92, N93, N93i, N95, N95 8GB, and N96; (l) applications developed, in part, through the use of Carbide C++, distributed through distribution sites, including but not limited to such applications distributed through Nokia's Ovi store; (m) Carbide.c++; and (n) reference designs that incorporate any of the Products, applications, and/or software described in (a)-(m).

18. "The '135 Patent" shall mean U.S. Patent No. 6,694,135, issued on February 17, 2004, and entitled "Measurement Report Transmission in a Telecommunications System" and all foreign counterparts thereof.

19. "The '672 Patent" shall mean U.S. Patent No. 7,092,672, issued on August 15, 2006, and entitled "Reporting Cell Measurement Results in a Cellular Communication System" and all foreign counterparts thereof.

20. "The '465 Patent" shall mean U.S. Patent No. 5,802,465, issued on September 1, 1998, and entitled "Data Transmission in a Radio Telephone Network" and all foreign counterparts thereof.

21. "The '904 Patent" shall mean U.S. Patent No. 6,359,904, issued on March 19, 2002, and entitled "Data Transfer in a Mobile Telephone Network" and all foreign counterparts thereof.

22. "The '548 Patent" shall mean U.S. Patent No. 6,775,548, issued on August 10, 2004, and entitled "Access Channel for Reduced Access Delay in a Telecommunications System" and all foreign counterparts thereof.

23. "The '178 Patent" shall mean U.S. Patent No. 5,862,178, issued on January 19,

1999, and entitled “Method and Apparatus for Speech Transmission in a Mobile Communications System” and all foreign counterparts thereof.

24. “The ‘651 Patent” shall mean U.S. Patent No. 5,946,651, issued on August 31, 1999, and entitled “Speech Synthesizer Employing Post-Processing for Enhancing the Quality of the Synthesized Speech” and all foreign counterparts thereof.

25. “The ‘727 Patent” shall mean U.S. Patent No. 6,882,727, issued on April 19, 2005, and entitled “Method of Ciphering Data Transmission in a Radio System” and all foreign counterparts thereof.

26. “The ‘940 Patent” shall mean U.S. Patent No. 7,009,940, issued on March 7, 2006, and entitled “Integrity Check in a Communication System” and all foreign counterparts thereof.

27. “The ‘621 Patent” shall mean U.S. Patent No. 7,403,621, issued on July 22, 2008, and entitled “System for Ensuring Encrypted Communication after Handover” and all foreign counterparts thereof.

28. “Nokia Patents-In-Suit” shall mean the ‘135 Patent, the ‘672 Patent, the ‘465 Patent, the ‘904 Patent, the ‘548 Patent, the ‘178 Patent, the ‘651 Patent, the ‘727 Patent, the ‘940 Patent, and the ‘621 Patent, individually and collectively, and all foreign counterparts thereof.

29. “Related Patents” shall mean any United States patent application for which any applicant is also a named inventor of any of the Nokia Patents-in-Suit, and that concern the same or similar subject matter as the Nokia Patent-in-Suit, as well as any continuation, continuation in part, divisional, or any other patent or patent application (including rejected, abandoned, or pending applications) derived in whole or in part from said application, and all foreign

counterpart patents or patent application (including rejected, abandoned, or pending applications).

30. “Nokia Named Inventors” shall mean the persons named as inventors on any of the Nokia Patents-In Suit—(a) Jarkko Oksala, (b) Kari Hautamaki, (c) Johanna Pekonen, (d) Leif Friman, (e) Harri Jokinen, (f) Jari Hamalainen, (g) Timo Jokiaho, (h) Arto Leppisaari, (i) Kari Huttunen, (j) Zhigang Rong, (k) Steven D. Gray, (l) Kari Jarvinen, (m) Janne Vainio, (n) Petri Haavisto, (o) Tero Honkanen, (p) Jukka Vialen, (q) Fabio Longoni, and (r) Valteri Niemi.

31. “Nokia Covered Product” shall mean any Product sold or offered for sale at any time by Nokia that Nokia contends practices any of the Nokia Patents-In-Suit.

32. “Essential” shall mean necessary for implementation of any mobile wireless technology standard, such that the standard, or some part of the standard, could not be practiced without infringing the patent or technology to which “essential” refers.

33. “ETSI” shall mean the European Telecommunications Standards Institute.

34. “IEEE” shall mean the Institute of Electrical and Electronics Engineers and Institute of Electrical and Electronics Engineers Standards Association (IEEE-SA).

35. “IPR” shall mean intellectual property rights, and includes patent rights.

36. “ITU” shall mean International Telecommunication Union.

37. The terms “Standards Setting Organization” or “SSO” shall mean an organization that adopts standards governing an industry or technological field, and includes without limitation ETSI, 3GPP, and IEEE.

38. “3GPP” shall mean Third Generation Partnership Project.

39. “Software” shall mean and include all forms of code including, but not limited to, source code, object code, firmware, compiled code, byte code, interpreted code, any form of

code stored in any storage medium (for example, ROM or Flash RAM chips) on any product, or code transmitted to products. Software further includes files written in any programming language, including, but not limited to, "C", "C++", assembler, VHDL, Verilog, digital signal processor ("DSP") programming language, "make" files, "include" files, script files, link files, and other human-readable text files used in the generation and/or building of software directly executed on a microprocessor, microcontroller, and/or DSP.

40. "Litigation" shall mean the above-referenced action, C.A. 09-791-GMS in the United States District Court for the District of Delaware.

41. "Person(s)" shall mean any natural person or any business, proprietorship, firm, partnership, corporation, association, organization, or other entity. The acts of a Person shall include the acts of directors, officers, owners, members, employees, agents, attorneys or other representatives acting on the Person's behalf.

42. "Document(s)" is defined broadly to be given the full scope of that term contemplated in Federal Rules of Civil Procedure 26 and 34, 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.

43. "Communication(s)" means any contact, oral or written, including electronic, whereby information of any nature is transmitted or transferred, including without limitation, a person(s) seeing or hearing any information by any means and any document memorializing or referring to the contact.

44. "Date(s)" shall mean the exact date(s), if known, or the closest approximation to the exact date(s) as can be specified, including without limitation the year, month, week in a month, or part of a month.

45. "Entity" shall mean corporation, company, firm, partnership, joint venture, association, governmental body or agency, or persons other than a natural person.

46. "Thing" shall be given the broadest possible construction under the Federal Rules of Civil Procedure.

47. "Relate to," "related to," and "relating to" shall mean in whole or in part concerning, reflecting, alluding to, mentioning, regarding, discussing, bearing upon, commenting on, constituting, pertaining to, demonstrating, describing, depicting, directly or indirectly relating to, summarizing, containing, embodying, showing, comprising, evidencing, refuting, contradicting, analyzing, identifying, stating, dealing with, and/or supporting.

48. "Describe," when used in relation to an act, event, instance, occasion, transaction, conversation, or communication, shall mean (a) to state the date and place thereof; (b) to identify the individual participants; (c) to summarize separately for each individual participant what he said or did; and (d) to identify each document used or prepared in connection therewith or making any reference thereto.

49. The term “identify,” when used with respect to any natural person, means that the following information shall be provided: the person’s full name; last known home address and telephone number; last known business address and telephone number; last known title or occupation; and last known employer.

50. The term “identify,” when used with respect to any entity (including without limitation corporation, company, firm, partnership, joint venture, association, governmental body or agency or persons other than a natural person), shall mean that the following information shall be provided: the full legal name of the entity; the place of incorporation or organization; the principal place of business; and the nature of the business conducted by that legal entity.

51. The term “identify,” when used with respect to a document, subject to the option to produce records under Rule 33(d) of the Federal Rules of Civil Procedure, shall mean to provide information sufficient to locate that document, including but not limited to the following: the Bates range, the date appearing on such document or, if no date appears thereon, the approximate date the document was prepared; the identifying code number, file number, title, or label of such document; a general description of such document (*e.g.*, letter, memorandum, drawing); the title or heading; the number of pages of which such document consists; the name of each person who signed or authorized the document; the name of each addressee; the name of each person having possession, custody, or control of such document; if the document existed at one time but does not presently exist, the reason(s) why it no longer exists and the identity of the last person having custody of it; and, if the document is in a foreign language, whether an English translation of the document exists, whether partial or complete.

52. The term “identify,” when used with reference to any communication, shall mean that the following information shall be provided: (a) summarize the substance of the

communication; (b) state the date and place of the communication; (c) identify each person who was present at, involved in, connected with or who participated in the communication; (d) state the form of communication (*e.g.*, telephone call, meeting, letter, etc.); and (e) identify each document memorializing or referring to the communication.

53. The term “identify,” when used with reference to a product or other tangible thing that is not a document or communication (including without limitation any products manufactured, developed, or sold by Nokia), shall mean that the following information shall be provided: (a) identify the product name(s), product number(s), version number(s), and revision number(s); (b) identify the date that the product or thing was first introduced for sale, the date of the thing’s first sale, and (c) identify all team names, code names, or project titles used in connection with the design, development, testing, or engineering of that product or tangible thing.

54. The term “identify,” when used with reference to a method, shall mean state or provide information supplying the date that the process was first used, the date the products or other objects made by the process were first sold, all numbers or codes used to refer to the process, including but not limited to process revision numbers or codes, all process names, and all team names or project titles used in connection with the design, development, testing, or engineering of that process.

55. Where an instruction or topic of examination below names a corporation or other legal entity, the instruction or topic of examination includes within its scope any parent, predecessors-in-interest, subsidiaries, affiliates, directors, officers, employees, agents, and representatives thereof, including attorneys, consultants, accountants, and investment bankers.

TOPICS OF EXAMINATION

1. Identification of any Nokia product that uses SAIC.
2. The identity and location of all documents, including source code, related to any Nokia product that uses SAIC.
3. The identity of all custodians of all documents, including source code, related to any Nokia product that uses SAIC.
4. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that uses SAIC, and the nature of their knowledge.
5. Identification of any Nokia product that performs filtering of GMSK signals.
6. The identity and location of all documents, including source code, related to any Nokia product that perform filtering of GMSK signals.
7. The identity of all custodians of all documents, including source code, related to any Nokia product that performs filtering of GMSK signals.
8. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that performs filtering of GMSK signals, and the nature of their knowledge.
9. Identification of any Nokia product with touch screen capabilities, including without limitation, products that permit scrolling of an electronic document on a touch-screen and products that are capable of displaying an area beyond the edge of the electronic document after the edge of the electronic document has been reached.
10. The identity and location of all documents, including source code, related to any Nokia product with touch screen capabilities, including without limitation, products that permit scrolling of an electronic document on a touch-screen and products that are capable of displaying

an area beyond the edge of the electronic document after the edge of the electronic document has been reached, including but not limited to the N900.

11. The identity of all custodians of all documents, including source code, related to any Nokia product with touch screen capabilities, including without limitation, products that permit scrolling of an electronic document on a touch-screen and products that are capable of displaying an area beyond the edge of the electronic document after the edge of the electronic document has been reached, including but not limited to the N900.

12. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product with touch screen capabilities, including without limitation, products that permit scrolling of an electronic document on a touch-screen and products that are capable of displaying an area beyond the edge of the electronic document after the edge of the electronic document has been reached, including but not limited to the N900, and the nature of their knowledge

13. Identification of any Nokia product that allows the user interface theme to be modified.

14. The identity and location of all documents, including source code, related to any Nokia product that allows the user interface theme to be modified, including but not limited to the following products: (a) E71; (b) N97; (c) N900; (d) 5310 XpressMusic; (e) 5530 XpressMusic; (f) 5610 XpressMusic; (g) 5730 XpressMusic; and (h) 5800 XpressMusic.

15. The identity of all custodians of all documents, including source code, related to any Nokia product that allows the user interface theme to be modified, including but not limited to the following products: (a) E71; (b) N97; (c) N900; (d) 5310 XpressMusic; (e) 5530 XpressMusic; (f) 5610 XpressMusic; (g) 5730 XpressMusic; and (h) 5800 XpressMusic.

16. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that allows the user interface theme to be modified, including but not limited to (a) E71; (b) N97; (c) N900; (d) 5310 XpressMusic; (e) 5530 XpressMusic; (f) 5610 XpressMusic; (g) 5730 XpressMusic; and (h) 5800 XpressMusic, and the nature of their knowledge

17. Identification of all user interface themes distributed by Nokia, including but not limited to any user interface theme distributed through Nokia's Ovi store.

18. The identity and location of all documents, including source code, related to user interface themes distributed by Nokia, including but not limited to any user interface theme distributed through Nokia's Ovi store.

19. The identity of all custodians of all documents, including source code, related to any user interface theme distributed by Nokia, including but not limited to user interface themes distributed through Nokia's Ovi store.

20. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any user interface theme distributed by Nokia, including but not limited to user interface themes distributed through Nokia's Ovi store, and the nature of their knowledge.

21. Identification of any Nokia product that uses the Java Push Registry to enable SMS Text Messaging and/or Instant Messaging.

22. The identity and location of all documents, including source code, related to any Nokia product that uses the Java Push Registry to enable SMS Text Messaging and/or Instant Messaging, including but not limited to the E71.

23. The identity of all custodians of all documents, including source code, related to any Nokia product that uses the Java Push Registry to enable SMS Text Messaging and/or Instant Messaging, including but not limited to the E71.

24. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that uses the Java Push Registry to enable SMS Text Messaging and/or Instant Messaging, including but not limited to the E71, and the nature of their knowledge

25. Identification of any Nokia product that launches an application in response to receiving an external message.

26. The identity and location of all documents, including source code, related to any Nokia product that launches an application in response to receiving an external message, including but not limited to the E71.

27. The identity of all custodians of all documents, including source code, related to any Nokia product that launches an application in response to receiving an external message, including but not limited to the E71.

28. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that launches an application in response to receiving an external message, including but not limited to the E71, and the nature of their knowledge.

29. Identification of any Nokia product that supports USB functionalities.

30. The identity and location of all documents, including source code, related to any Nokia product that supports USB functionalities, including but not limited to (a) 5310 XpressMusic; (b) 5530 XpressMusic; (c) 5610 XpressMusic; (d) 5730 XpressMusic; (e) 5800

XpressMusic; (f) 6210 Navigator; (g) 6555; (h) N81; (i) N81 8GB; (j) N82; (k) 3600; (l) 6205; (m) 7610 Supernova; (n) E66; (o) E71; (p) N79; (q) N85; (r) E63; (s) 7205 Intrigue; (t) E71x; (u) E75; (v) 1006; (w) N86 8MP; (x) N97; (y) E72; (z) 3711; (aa) 6790; (bb) N97 mini; (cc) N900; (dd) 6350; (ee) N810; (ff) 3300; (gg) 6086; (hh) 6126; (ii) 6230; (jj) 6670; (kk) 7270; (ll) 7610; (mm) 9500; (nn) N70; (oo) N71; (pp) N72; (qq) N73; (rr) N80; (ss) N93; (tt) 3100; (uu) 5100; (vv) 5140; (ww) 6100; (xx) 6610; (yy) 6800; (zz) 6820; (aaa) 6822 (bbb) Nokia Connectivity Adapter AD-73; and (ccc) and Nokia Booklet 3G.

31. The identity of all custodians of all documents, including source code, related to any Nokia product that supports USB functionalities, including but not limited to the following products: (a) 5310 XpressMusic; (b) 5530 XpressMusic; (c) 5610 XpressMusic; (d) 5730 XpressMusic; (e) 5800 XpressMusic; (f) 6210 Navigator; (g) 6555; (h) N81; (i) N81 8GB; (j) N82; (k) 3600; (l) 6205; (m) 7610 Supernova; (n) E66; (o) E71; (p) N79; (q) N85; (r) E63; (s) 7205 Intrigue; (t) E71x; (u) E75; (v) 1006; (w) N86 8MP; (x) N97; (y) E72; (z) 3711; (aa) 6790; (bb) N97 mini; (cc) N900; (dd) 6350; (ee) N810; (ff) 3300; (gg) 6086; (hh) 6126; (ii) 6230; (jj) 6670; (kk) 7270; (ll) 7610; (mm) 9500; (nn) N70; (oo) N71; (pp) N72; (qq) N73; (rr) N80; (ss) N93; (tt) 3100; (uu) 5100; (vv) 5140; (ww) 6100; (xx) 6610; (yy) 6800; (zz) 6820; (aaa) 6822 (bbb) Nokia Connectivity Adapter AD-73; and (ccc) and Nokia Booklet 3G.

32. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that supports Universal Serial Bus (“USB”) functionalities, including but not limited to (a) 5310 XpressMusic; (b) 5530 XpressMusic; (c) 5610 XpressMusic; (d) 5730 XpressMusic; (e) 5800 XpressMusic; (f) 6210 Navigator; (g) 6555; (h) N81; (i) N81 8GB; (j) N82; (k) 3600; (l) 6205; (m) 7610 Supernova; (n) E66; (o) E71; (p) N79; (q) N85; (r) E63; (s) 7205 Intrigue; (t) E71x; (u) E75; (v)

1006; (w) N86 8MP; (x) N97; (y) E72; (z) 3711; (aa) 6790; (bb) N97 mini; (cc) N900; (dd) 6350; (ee) N810; (ff) 3300; (gg) 6086; (hh) 6126; (ii) 6230; (jj) 6670; (kk) 7270; (ll) 7610; (mm) 9500; (nn) N70; (oo) N71; (pp) N72; (qq) N73; (rr) N80; (ss) N93; (tt) 3100; (uu) 5100; (vv) 5140; (ww) 6100; (xx) 6610; (yy) 6800; (zz) 6820; (aaa) 6822 (bbb) Nokia Connectivity Adapter AD-73; and (ccc) and Nokia Booklet 3G, and the nature of their knowledge.

33. Identification of any Nokia product that contains an ARM Cortex-A5 Series processor, ARM Cortex-A8 Series processor, ARM Cortex-A9 Series processor or an ARM11 processor.

34. The identity and location of all documents, including source code, related to any Nokia product that contains an ARM Cortex-A5 Series processor, ARM Cortex-A8 Series processor, ARM Cortex-A9 Series processor or an ARM11 processor, including but not limited to (a) N97; (b) N95-3 NAM; (c) N97 mini; (d) X6; (e) E72; (f) N82; (g) N95; (h) N93; (i) 5800 XpressMusic; (j) N85; (k) 6700; (l) N810; (m) N900; (n) E90; (o) N76; (p) N93; (q) E71; and (r) 6290.

35. The identity of all custodians of all documents, including source code, related to any Nokia product that contains an ARM Cortex-A5 Series processor, ARM Cortex-A8 Series processor, ARM Cortex-A9 Series processor or an ARM11 processor, including but not limited to (a) N97; (b) N95-3 NAM; (c) N97 mini; (d) X6; (e) E72; (f) N82; (g) N95; (h) N93; (i) 5800 XpressMusic; (j) N85; (k) 6700; (l) N810; (m) N900; (n) E90; (o) N76; (p) N93; (q) E71; and (r) 6290.

36. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any Nokia product that contains an ARM Cortex-A5 Series processor, ARM Cortex-A8 Series processor, ARM Cortex-A9 Series

processor or an ARM11 processor, including but not limited to (a) N97; (b) N95-3 NAM; (c) N97 mini; (d) X6; (e) E72; (f) N82; (g) N95; (h) N93; (i) 5800 XpressMusic; (j) N85; (k) 6700; (l) N810; (m) N900; (n) E90; (o) N76; (p) N93; (q) E71; and (r) 6290, and the nature of their knowledge.

37. Identification of any Nokia product that utilizes the Symbian OS, including the specific version of the Symbian OS used by each such Nokia product.

38. The identity and location of all documents, including source code, related to any Nokia product that utilizes the Symbian OS, including but not limited to (a) 7650; (b) 3600; (c) 3620; (d) 3650; (e) 3660; (f) N-Gage; (g) N-Gage QD; (h) 6600; (i) 3230; (j) 6260; (k) 6620; (l) 6670; (m) 7610; (n) 6630; (o) 6680; (p) 6681; (q) 6682; (r) N70; (s) N72; (t) N90; (u) 3250; (v) 5500 Sport; (w) E50; (x) E60; (y) E61; (z) E61i; (aa) E62; (bb) E65; (cc) E70; (dd) N71; (ee) N73; (ff) N75; (gg) N77; (hh) N80; (ii) N91; (jj) N91 8GB; (kk) N92; (ll) N93; (mm) N93i; (nn) 5700 XpressMusic; (oo) 6110 Navigator; (pp) 6120; (qq) 6121; (rr) 6124; (ss) 6290; (tt) E51; (uu) E63; (vv) E66; (ww) E71; (xx) E90 Communicator; (yy) N76; (zz) N81; (aaa) N81 8GB; (bbb) N82; (ccc) N95; (ddd) N95 8GB; (eee) 5230 XpressMusic; (fff) 5630 XpressMusic; (ggg) 5730 XpressMusic; (hhh) 6210; (iii) 6220; (jjj) 6650; (kkk) 6710 Navigator; (lll) 6720; (mmm) 6730; (nnn) 6760; (ooo) 6790 Surge; (ppp) E52; (qqq) E55; (rrr) E71x; (sss) E72; (ttt) E75; (uuu) N78; (vvv) N79; (www) N85; (xxx) N86 8MP; (yyy) N96; (zzz) 5800 XpressMusic; (aaaa) 5800 Navigation Edition; (bbbb) 5530 XpressMusic; (cccc) 5230; (dddd) N97; (eeee) N97 mini; (ffff) X6; (gggg) 7710; (hhhh) 9210; (iiii) 9300; and (jjjj) 9500.

39. The identity of all custodians of all documents, including source code, related to any Nokia product that utilizes the Symbian OS, including but not limited to (a) 7650; (b) 3600; (c) 3620; (d) 3650; (e) 3660; (f) N-Gage; (g) N-Gage QD; (h) 6600; (i) 3230; (j) 6260; (k) 6620;

(l) 6670; (m) 7610; (n) 6630; (o) 6680; (p) 6681; (q) 6682; (r) N70; (s) N72; (t) N90; (u) 3250; (v) 5500 Sport; (w) E50; (x) E60; (y) E61; (z) E61i; (aa) E62; (bb) E65; (cc) E70; (dd) N71; (ee) N73; (ff) N75; (gg) N77; (hh) N80; (ii) N91; (jj) N91 8GB; (kk) N92; (ll) N93; (mm) N93i; (nn) 5700 XpressMusic; (oo) 6110 Navigator; (pp) 6120; (qq) 6121; (rr) 6124; (ss) 6290; (tt) E51; (uu) E63; (vv) E66; (ww) E71; (xx) E90 Communicator; (yy) N76; (zz) N81; (aaa) N81 8GB; (bbb) N82; (ccc) N95; (ddd) N95 8GB; (eee) 5230 XpressMusic; (fff) 5630 XpressMusic; (ggg) 5730 XpressMusic; (hhh) 6210; (iii) 6220; (jjj) 6650; (kkk) 6710 Navigator; (lll) 6720; (mmm) 6730; (nnn) 6760; (ooo) 6790 Surge; (ppp) E52; (qqq) E55; (rrr) E71x; (sss) E72; (ttt) E75; (uuu) N78; (vvv) N79; (www) N85; (xxx) N86 8MP; (yyy) N96; (zzz) 5800 XpressMusic; (aaaa) 5800 Navigation Edition; (bbbb) 5530 XpressMusic; (cccc) 5230; (dddd) N97; (eeee) N97 mini; (ffff) X6; (gggg) 7710; (hhhh) 9210; (iiii) 9300; and (jjjj) 9500.

40. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any product that utilizes the Symbian OS, including but not limited to (a) 7650; (b) 3600; (c) 3620; (d) 3650; (e) 3660; (f) N-Gage; (g) N-Gage QD; (h) 6600; (i) 3230; (j) 6260; (k) 6620; (l) 6670; (m) 7610; (n) 6630; (o) 6680; (p) 6681; (q) 6682; (r) N70; (s) N72; (t) N90; (u) 3250; (v) 5500 Sport; (w) E50; (x) E60; (y) E61; (z) E61i; (aa) E62; (bb) E65; (cc) E70; (dd) N71; (ee) N73; (ff) N75; (gg) N77; (hh) N80; (ii) N91; (jj) N91 8GB; (kk) N92; (ll) N93; (mm) N93i; (nn) 5700 XpressMusic; (oo) 6110 Navigator; (pp) 6120; (qq) 6121; (rr) 6124; (ss) 6290; (tt) E51; (uu) E63; (vv) E66; (ww) E71; (xx) E90 Communicator; (yy) N76; (zz) N81; (aaa) N81 8GB; (bbb) N82; (ccc) N95; (ddd) N95 8GB; (eee) 5230 XpressMusic; (fff) 5630 XpressMusic; (ggg) 5730 XpressMusic; (hhh) 6210; (iii) 6220; (jjj) 6650; (kkk) 6710 Navigator; (lll) 6720; (mmm) 6730; (nnn) 6760; (ooo) 6790 Surge; (ppp) E52; (qqq) E55; (rrr) E71x; (sss) E72; (ttt) E75; (uuu) N78; (vvv) N79; (www)

N85; (xxx) N86 8MP; (yyy) N96; (zzz) 5800 XpressMusic; (aaaa) 5800 Navigation Edition; (bbbb) 5530 XpressMusic; (cccc) 5230; (dddd) N97; (eeee) N97 mini; (ffff) X6; (gggg) 7710; (hhhh) 9210; (iiii) 9300; and (jjjj) 9500, and the nature of their knowledge.

41. Identification of any Nokia product that includes applications developed, in part, through the use of Carbide C++.

42. The identity and location of all documents, including source code, related to Carbide C++ or any Nokia product that includes applications developed, in part, through the use of Carbide C++, including but not limited to (a) N97; (b) N97 mini; (c) N900; (d) 5530 XpressMusic; (e) 5800 XpressMusic; (f) N79; (g) N85; (h) N86 8MP; (i) E63; (j) E66; (k) E71; (l) E71x; (m) E72; (n) E75; (o) 7705; (p) 7610; (q) 7510; (r) 7205; (s) 5800 XpressMusic; (t) 5800 Navigation Edition; (u) 5730 XpressMusic; (v) 5610 XpressMusic; (w) 5530 XpressMusic; (x) 5310 XpressMusic; (y) 3711; (z) 3600; (aa) 2705; (bb) n-Gage; (cc) n-Gage XD; (dd) 3230; (ee) 3250; (ff) 3620; (gg) 3650; (hh) 3660; (ii) 5230 XpressMusic; (jj) 5500 Sport; (kk) 5630 XpressMusic; (ll) 5700 XpressMusic; (mm) 6110 Navigator; (nn) 6120; (oo) 6121; (pp) 6124; (qq) 6210; (rr) 6220; (ss) 6260; (tt) 6600; (uu) 6620; (vv) 6630; (ww) 6650; (xx) 6670; (yy) 6680; (zz) 6681; (aaa) 6682; (bbb) 6710 Navigator; (ccc) 6720; (ddd) 6730; (eee) 6760; (fff) 6790 Surge; (ggg) 7610; (hhh) 7650; (iii) 7710; (jjj) 9210; (kkk) 9300; (lll) 9500; (mmm) E50; (nnn) E60; (ooo) E61; (ppp) E61i; (qqq) E62; (rrr) E65; (sss) E70; (ttt) N70; (uuu) N71; (vvv) N72; (www) N73; (xxx) N75; (yyy) N76; (zzz) N77; (aaaa) N78; (bbbb) N80; (cccc) N81; (dddd) N81 8GB; (eeee) N82; (ffff) N90; (gggg) N91; (hhhh) N91 8GB; (iiii) N92; (jjjj) N93; (kkkk) N93i; (llll) N95; (mmmm) N95 8GB; and (nnnn) N96.

43. The identity of all custodians of all documents, including source code, related to Carbide C++ or any Nokia product that includes applications developed, in part, through the use

of Carbide C++, including but not limited to (a) N97; (b) N97 mini; (c) N900; (d) 5530 XpressMusic; (e) 5800 XpressMusic; (f) N79; (g) N85; (h) N86 8MP; (i) E63; (j) E66; (k) E71; (l) E71x; (m) E72; (n) E75; (o) 7705; (p) 7610; (q) 7510; (r) 7205; (s) 5800 XpressMusic; (t) 5800 Navigation Edition; (u) 5730 XpressMusic; (v) 5610 XpressMusic; (w) 5530 XpressMusic; (x) 5310 XpressMusic; (y) 3711; (z) 3600; (aa) 2705; (bb) n-Gage; (cc) n-Gage XD; (dd) 3230; (ee) 3250; (ff) 3620; (gg) 3650; (hh) 3660; (ii) 5230 XpressMusic; (jj) 5500 Sport; (kk) 5630 XpressMusic; (ll) 5700 XpressMusic; (mm) 6110 Navigator; (nn) 6120; (oo) 6121; (pp) 6124; (qq) 6210; (rr) 6220; (ss) 6260; (tt) 6600; (uu) 6620; (vv) 6630; (ww) 6650; (xx) 6670; (yy) 6680; (zz) 6681; (aaa) 6682; (bbb) 6710 Navigator; (ccc) 6720; (ddd) 6730; (eee) 6760; (fff) 6790 Surge; (ggg) 7610; (hhh) 7650; (iii) 7710; (jjj) 9210; (kkk) 9300; (lll) 9500; (mmm) E50; (nnn) E60; (ooo) E61; (ppp) E61i; (qqq) E62; (rrr) E65; (sss) E70; (ttt) N70; (uuu) N71; (vvv) N72; (www) N73; (xxx) N75; (yyy) N76; (zzz) N77; (aaaa) N78; (bbbb) N80; (cccc) N81; (dddd) N81 8GB; (eeee) N82; (ffff) N90; (gggg) N91; (hhhh) N91 8GB; (iiii) N92; (jjjj) N93; (kkkk) N93i; (llll) N95; (mmmm) N95 8GB; and (nnnn) N96.

44. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of Carbide C++ or any Nokia product that includes applications developed, in part, through the use of Carbide C++, including but not limited to (a) N97; (b) N97 mini; (c) N900; (d) 5530 XpressMusic; (e) 5800 XpressMusic; (f) N79; (g) N85; (h) N86 8MP; (i) E63; (j) E66; (k) E71; (l) E71x; (m) E72; (n) E75; (o) 7705; (p) 7610; (q) 7510; (r) 7205; (s) 5800 XpressMusic; (t) 5800 Navigation Edition; (u) 5730 XpressMusic; (v) 5610 XpressMusic; (w) 5530 XpressMusic; (x) 5310 XpressMusic; (y) 3711; (z) 3600; (aa) 2705; (bb) n-Gage; (cc) n-Gage XD; (dd) 3230; (ee) 3250; (ff) 3620; (gg) 3650; (hh) 3660; (ii) 5230 XpressMusic; (jj) 5500 Sport; (kk) 5630 XpressMusic; (ll) 5700

XpressMusic; (mm) 6110 Navigator; (nn) 6120; (oo) 6121; (pp) 6124; (qq) 6210; (rr) 6220; (ss) 6260; (tt) 6600; (uu) 6620; (vv) 6630; (ww) 6650; (xx) 6670; (yy) 6680; (zz) 6681; (aaa) 6682; (bbb) 6710 Navigator; (ccc) 6720; (ddd) 6730; (eee) 6760; (fff) 6790 Surge; (ggg) 7610; (hhh) 7650; (iii) 7710; (jjj) 9210; (kkk) 9300; (lll) 9500; (mmm) E50; (nnn) E60; (ooo) E61; (ppp) E61i; (qqq) E62; (rrr) E65; (sss) E70; (ttt) N70; (uuu) N71; (vvv) N72; (www) N73; (xxx) N75; (yyy) N76; (zzz) N77; (aaaa) N78; (bbbb) N80; (cccc) N81; (dddd) N81 8GB; (eeee) N82; (ffff) N90; (gggg) N91; (hhhh) N91 8GB; (iiii) N92; (jjjj) N93; (kkkk) N93i; (llll) N95; (mmmm) N95 8GB; and (nnnn) N96, and the nature of their knowledge.

45. Identification of any Nokia application developed, in part, through the use of Carbide C++, distributed through distribution sites, including but not limited to such applications distributed through Nokia's Ovi store.

46. The identity and location of all documents, including source code, related to Carbide C++ or any Nokia application developed, in part, through the use of Carbide C++, distributed through distribution sites, including but not limited to such applications distributed through Nokia's Ovi store.

47. The identity of all custodians of all documents, including source code, related to Carbide C++ or any Nokia application developed, in part, through the use of Carbide C++, distributed through distribution sites, including but not limited to such applications distributed through Nokia's Ovi store.

48. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of Carbide C++ or any Nokia application developed, in part, through the use of Carbide C++, distributed through distribution sites,

including but not limited to such applications distributed through Nokia's Ovi store, and the nature of their knowledge.

49. Identification of any reference design that incorporates any of the Nokia Accused Products, applications, and/or software described in Topics 1-48.

50. The identity and location of all documents, including source code, related to any reference design that incorporates any of the Nokia Accused Products, applications, and/or software described in Topics 1-48.

51. The identity of all custodians of all documents, including source code, related to any reference design that incorporates any of the Nokia Accused Products, applications, and/or software described in Topics 1-48.

52. The identity of the 5 individuals most knowledgeable regarding the research, development, configuration, design, and/or sourcing of any reference design that incorporates any of the Nokia Accused Products, applications, and/or software described in Topics 1-48, and the nature of their knowledge.

53. Nokia's communications with any entities concerning the alleged infringement, validity or enforceability of the Apple Patents-in-Suit.

54. Nokia's suppliers, manufacturers, distributors or customers of any Nokia Accused Product.

55. Nokia's channels of distribution for the Nokia Accused Products.

56. The marketing, sale, offer of sale of any Nokia Accused Product.

57. The date of first sale of each Nokia Accused Product anywhere in the world, and the identity of the entities to whom the sale was made.

58. The brand names of each Nokia Accused Product.

59. Revenues and profits derived by Nokia relating to the Nokia Accused Products.

60. Nokia's organizational structure and the documents historically and routinely created or created in the ordinary course of business, by each unit or subunit of the organizational structure.

61. The identities of custodians of Nokia's documents and files responsive to Apple's First and Second Sets of Requests for Production or Apple's First and Second Sets of Interrogatories to Nokia.

62. The methodology, procedure and efforts made by Nokia to identify, search for, locate, gather and produce documents and files responsive to Apple's First and Second Sets of Requests for Production of Documents or Apple's First and Second Sets of Interrogatories to Nokia.

63. The identities of persons who were involved in identifying, searching for, locating, gathering and producing documents and files responsive to Apple's First and Second Sets of Requests for Production or Apple's First and Second Sets of Interrogatories to Nokia.

64. The identities of persons who were contacted to identify, search for, locate, gather and produce documents and files responsive to Apple's First and Second Sets of Requests for Production or Apple's First and Second Sets of Interrogatories to Nokia.

65. All locations that were searched for documents and files responsive to Apple's First and Second Sets of Requests for Production or Apple's First and Second Sets of Interrogatories to Nokia.

66. All locations where documents and files responsive to Apple's First and Second Sets of Requests for Production or Apple's First and Second Sets of Interrogatories to Nokia are located.

67. The nature and ability of Nokia's accounting system, including its ability to create spreadsheets of financial data and the financial information stored therein.

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

CERTIFICATE OF SERVICE

I, Richard L. Horwitz, hereby certify that on August 23, 2010, 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 August 23, 2010, the attached document was electronically mailed to the following person(s)

Jack B. Blumenfeld
Rodger D. Smith II
Morris, Nichols, Arsht & Tunnell LLP
1201 North Market Street
Wilmington, DE 19899
jblumenfeld@mnat.com
rsmith@mnat.com

Adam J. Biegel
Keith E. Broyles
Patrick J. Flinn
John D. Haynes
Ryan W. Koppelman
Mark A. McCarty
Peter Kontio
Alston & Bird LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
adam.biegel@alston.com
keith.broyles@alston.com
patrick.flinn@alston.com
john.haynes@alston.com
ryan.koppelman@alston.com
mark.mccarty@alston.com
peter.kontio@alston.com

Alan L. Whitehurst
The Atlantic Building
950 F Street, NW
Washington, DC 20004-1404
alan.whitehurst@alston.com

/s/ Richard L. Horwitz

Richard L. Horwitz

David E. Moore

POTTER ANDERSON & CORROON LLP

(302) 984-6000

rhorwitz@potteranderson.com

dmoore@potteranderson.com

941557/35035