

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF

CERTAIN ELECTRONIC DEVICES  
WITH COMMUNICATION  
CAPABILITIES, COMPONENTS  
THEREOF, AND RELATED SOFTWARE

Apple Inc.  
1 Infinite Loop  
Cupertino, CA 95014

MISC. ACTION NO. \_\_\_\_\_

REQUEST FOR ISSUANCE OF A  
LETTER OF REQUEST FOR THE  
TAKING OF EVIDENCE IN ENGLAND

Letter of Request to Obtain Evidence from:  
Cambridge Silicon Radio International, PLC  
Churchill House  
Cambridge Business Park  
Cowley Road  
Cambridge CB4-0WZ  
United Kingdom

**APPLE INC.'S MOTION FOR ISSUANCE OF A LETTER OF REQUEST UNDER THE  
HAGUE CONVENTION FOR THE TAKING OF EVIDENCE IN ENGLAND**

Apple Inc. respectfully moves for this Court to issue the attached Letter of Request (Exhibit 1) pursuant to 28 U.S.C. § 1781 and Federal Rule of Civil Procedure 28(b), to the Appropriate Judicial Authority in England to enable Apple to obtain evidence under the Hague Convention<sup>1</sup> from:

Cambridge Silicon Radio International, PLC (“CSR England”)  
Churchill House  
Cambridge Business Park  
Cowley Road  
Cambridge CB4-0WZ  
United Kingdom

The Letter of Request seeks documents and testimony from CSR England and/or its corporate designee(s) beginning at the earliest practicable date.

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<sup>1</sup> Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters.

Apple seeks relevant information from CSR England to defend itself against patent infringement allegations brought by HTC Corporation in U.S. International Trade Commission Investigation No. 337-TA-808.<sup>2</sup> (*See* Ex. 1, Proposed Letter of Request.) Apple believes CSR England possesses evidence regarding the validity of one or more asserted patents by virtue of CSR England's manufacture and sales of prior art devices. Apple originally sought this information through a subpoena for documents and testimony to CSR England's U.S. affiliate, Cambridge Silicon Radio International, LLC (“CSR America”). (*See* Ex. 2, Subpoena to CSR America (Apr. 9, 2012).) However, CSR America responded that the requested documents and knowledgeable individuals are in England with CSR England, and that CSR America could not direct CSR England to comply with the subpoena.

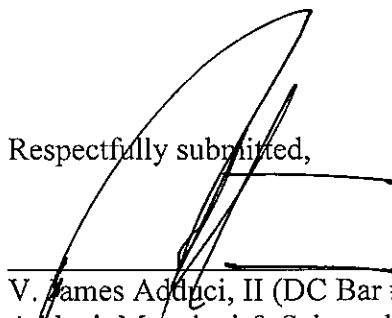
Accordingly, Apple must seek the documents and testimony directly from CSR England. Because the United Kingdom is a signatory to the Hague Convention, however, Apple cannot obtain this highly relevant evidence from CSR England without a Letter of Request. For the reasons set forth herein and more fully in the accompanying memorandum, Apple respectfully requests that the Court assign a judge to this matter and, if needed, schedule a hearing to expedite issuing the attached Letter of Request so the parties have enough time to obtain the requested evidence as required by the English judicial authority, and comply with the ITC’s procedural schedule.

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<sup>2</sup> Apple is the sole respondent in the ITC’s investigation into whether Apple has imported products that infringe eight patents asserted by HTC.

Dated: June 5, 2012

Respectfully submitted,



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