

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 1:10-CV-23580-UU**

_____	)
MOTOROLA MOBILITY, INC.,	)
	)
Plaintiff,	)
	)
v.	)
	)
APPLE INC.,	)
	)
Defendant.	)
_____	)
APPLE INC.,	)
	)
Counterclaim-Plaintiff,	)
	)
v.	)
	)
MOTOROLA, INC. and	)
MOTOROLA MOBILITY, INC.,	)
	)
Counterclaim-Defendants.	)
_____	)

**DECLARATION OF CHRISTINE SAUNDERS HASKETT  
IN SUPPORT OF DEFENDANT AND COUNTERCLAIM-PLAINTIFF  
APPLE INC.'S SUPPLEMENTAL CLAIM CONSTRUCTION BRIEF**

I, Christine Saunders Haskett, hereby declare:

1. I am a partner with the law firm of Covington & Burling LLP, counsel of record for Apple Inc. (“Apple”) in the above-captioned matter. The matters referenced in this declaration are based on personal knowledge and if called as a witness I could, and would, testify competently to these matters.
2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the transcript of the *Markman* hearing held in this matter on October 18, 2011.
3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from Apple’s *Markman* Presentation Regarding U.S. Patent No. 5,754,119.
4. Attached hereto as Exhibit 3 is a true and correct copy of Motorola’s Infringement Contentions regarding U.S. Patent No. 5,754,119, served May 18, 2011.
5. Attached hereto as Exhibit 4 is a true and correct copy of European Patent No. EP 0847654 B1.
6. Attached hereto as Exhibit 5 is a side-by-side comparison of claim 1 of U.S. Patent No. 5,754,119 and claim 1 of European Patent No. EP 0847654 B1, prepared by Apple for this supplemental brief.
7. Attached hereto as Exhibit 6 is a true and correct copy of the English translation of Motorola’s Reply Brief in Case No. 7 O 229/11 in the Mannheim Regional Court, Germany.
8. Rule 43 of the Convention on the Grant of European Patents requires that the claims in European patents “define the matter for which protection is sought in terms of the technical features of the invention.” The Rule further specifies that “[w]herever appropriate, claims shall contain: (a) a statement indicating the designation of the subject-matter of the invention and those technical features which are necessary for the definition of the claimed subject-matter but

which, in combination, form part of the prior art; and (b) a characterising portion, beginning with the expression "characterised in that" or "characterised by" and specifying the technical features for which, in combination with the features stated under sub-paragraph (a), protection is sought. *See* Convention on the Grant of European Patents, Rule 43(1), attached hereto as Exhibit 7.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 26, 2011 at San Francisco, California.

*/s/ Christine Saunders Haskett*  
Christine Saunders Haskett