

Exhibit A

**UNITED STATES PATENT NO. 5,710,987**

**SUPPLEMENTAL INFRINGEMENT CONTENTIONS<sup>1</sup>**

**Accused Apple Product<sup>2</sup>:** Apple iPhone 4, Apple iPhone 4S.

'987 Patent Claim	Apple iPhone 4 <sup>3</sup>
13. A receiver including a user interface comprising:	<p>Upon information and belief, Apple imports, manufactures, sells, offers to sell, and uses the Apple iPhone 4, which includes a receiver and several user interfaces, including a touch-screen display , volume control buttons , and speaker.</p> <p><i>See, e.g.</i>, iPhone 4 Technical Specifications, (<a href="http://www.apple.com/iphone/specs.html">http://www.apple.com/iphone/specs.html</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126659:</p>

<sup>1</sup> Motorola Mobility's investigation is ongoing and discovery and claim construction are not yet complete. Apple has, thus far, produced neither all documents relevant to the accused methods and products, nor the requested Rule 30(b)(6) witnesses. Mobility reserves the right to supplement or amend these contentions with contentions arising under the doctrine of equivalents in response to any proposed or ordered claim construction, subsequent discovery response or production, or subsequent disclosure made pursuant to FRCP 26.

<sup>2</sup> Motorola reserves the right to supplement this list of Accused Apple Products.

<sup>3</sup> This chart provides Motorola's infringement analysis for the Accused Apple Products. Upon information and belief, the analysis set forth in this chart for the Apple iPhone 4 applies equally to the Apple iPhone 4S.

‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	<div data-bbox="447 310 676 760"> </div> <div data-bbox="743 363 1087 393"> <p><b>Cellular and wireless</b></p> </div> <div data-bbox="753 440 1339 727"> <ul style="list-style-type: none"> <li>■ GSM model: UMTS/HSDPA/HSUPA (850, 900, 1900, 2100 MHz); GSM/EDGE (850, 900, 1800, 1900 MHz)</li> <li>■ CDMA model: CDMA EV-DO Rev. A (800, 1900 MHz)</li> <li>■ 802.11b/g/n Wi-Fi (802.11n 2.4GHz only)</li> <li>■ Bluetooth 2.1 + EDR wireless technology</li> </ul> </div> <div data-bbox="436 805 1839 870"> <p>See also iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949-50:</p> </div> <div data-bbox="443 927 1644 1170"> <div data-bbox="1052 979 1331 1008"> <p><b>Stainless Steel Band</b></p> </div> <div data-bbox="1052 1019 1619 1141"> <p>Created from our own alloy, then forged to be five times stronger than standard steel, the CNC-machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas.</p> </div> </div>

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<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	 <p><b>Mic + Speaker</b>          While most phones have only one microphone, iPhone 4 has two. The main mic, located on the bottom next to the dock connector, is for phone calls, voice commands, and memos. The second mic, built into the top near the headphone jack, is for FaceTime calls and for making your phone calls better. It works with the main mic to suppress unwanted and distracting background sounds, such as music and loud conversations. This dual-mic noise suppression helps make every conversation a quiet one.</p>
<p>a housing;</p>	<p>Upon information and belief, the Apple iPhone 4 contains a housing .  <i>See e.g.</i>, iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193 (arrows and labels added):</p>


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<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	 <p data-bbox="443 889 1879 961">See <i>e.g.</i>, iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127208 (arrows and labels added):</p>

Exhibit A

'987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	<p data-bbox="447 305 604 354"><a href="#">View huge Image metadata</a></p>  <p data-bbox="447 1076 1843 1149"><i>See also</i> iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126952:</p>

Exhibit A

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	 A photograph of an Apple iPhone 4, shown from a three-quarter perspective. The screen displays a racing game with a car in the foreground and other vehicles on a track. The game's interface includes a speedometer and a lap counter. The phone is silver and black, with its characteristic design.
receiver circuitry disposed in the housing; and	Upon information and belief, the Apple iPhone 4 has receiver circuitry disposed in the housing. <i>See, e.g.</i> , iPhone Teardown, ( <a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2</a> ), accessed on May 13, 2011, MOTO-APPLE-0006037953_127192-94 (arrows and labels added):



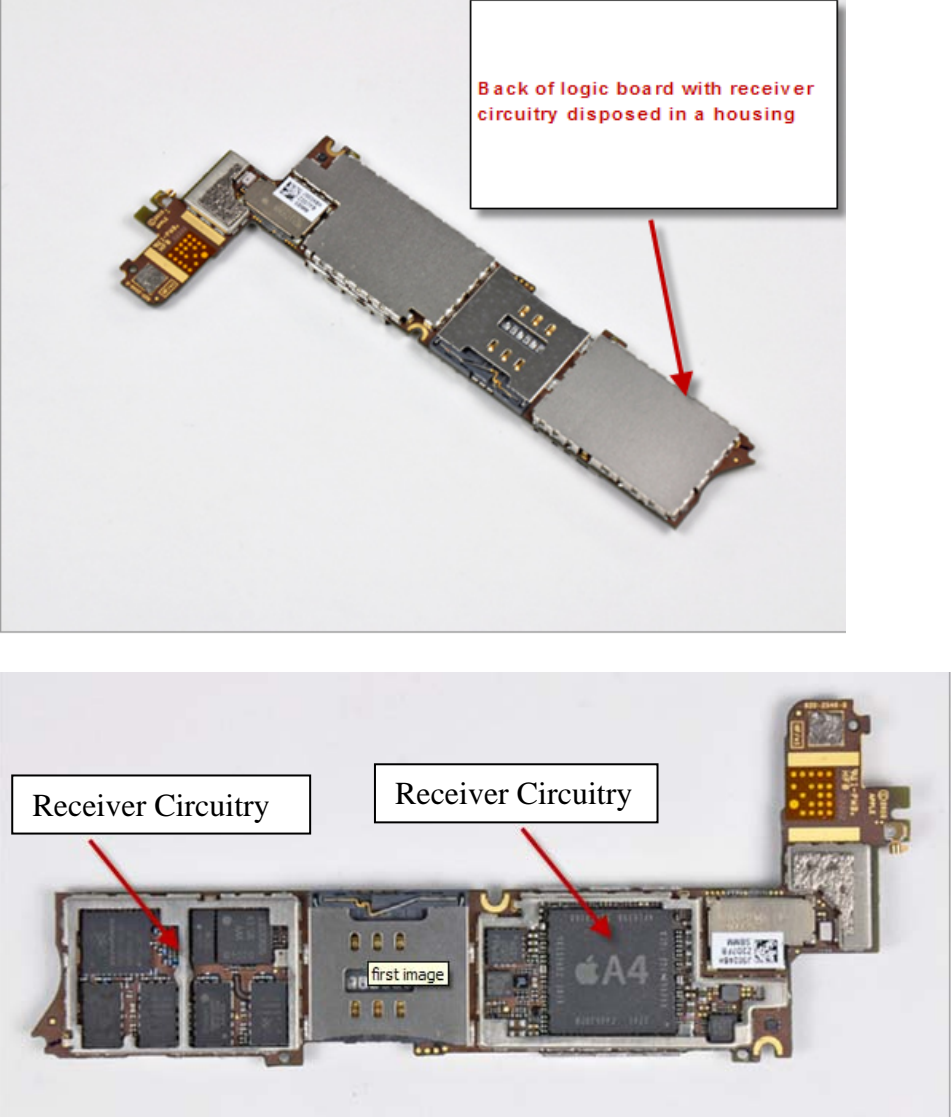
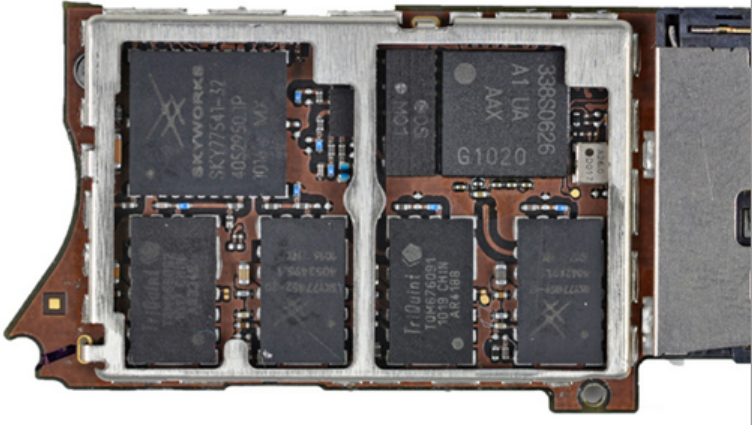
<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>	
		<p><b>Step 10</b></p> <ul style="list-style-type: none"><li>● Removing one of the many connectors on the logic board.</li><li>● In our brief usage, we did notice that the phone is considerably warmer on the right side. This makes sense, as the logic board is located entirely along the right side of the phone.</li></ul>

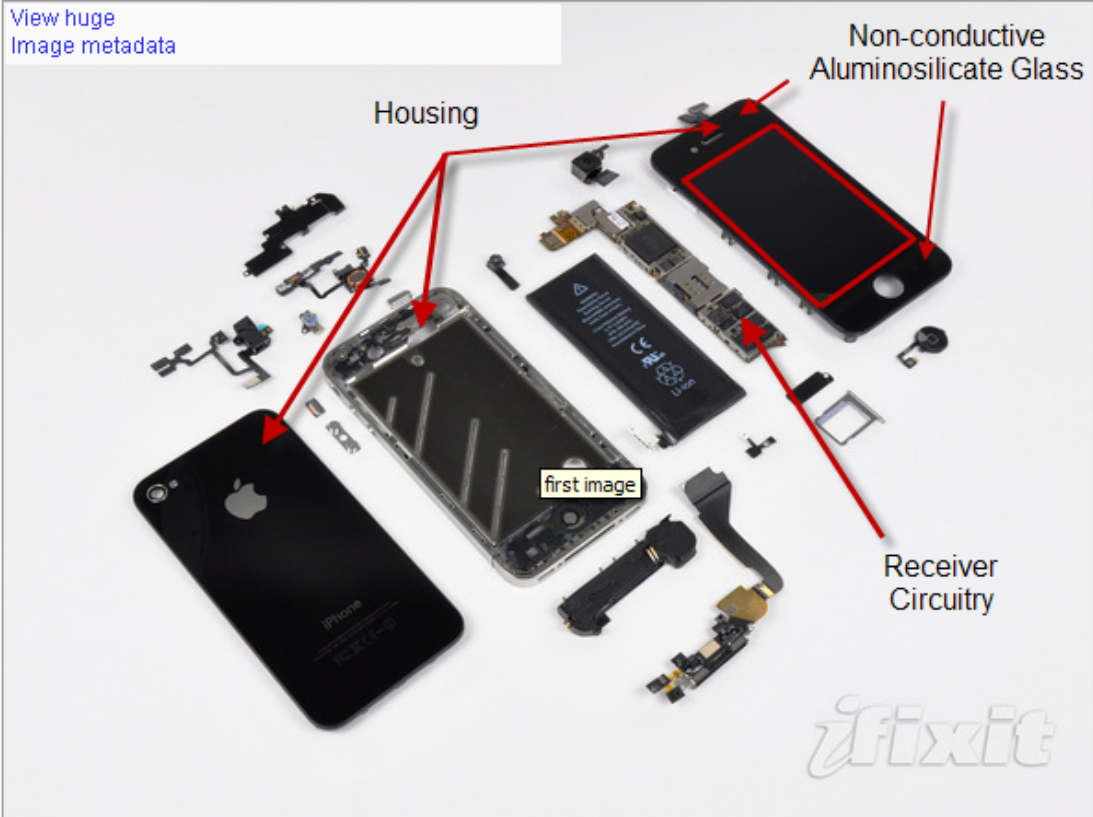
Exhibit A



<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	




'987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	 <p>Back of logic board with receiver circuitry disposed in a housing</p> <p>Receiver Circuitry</p> <p>Receiver Circuitry</p> <p>first image</p> <p>A4</p>

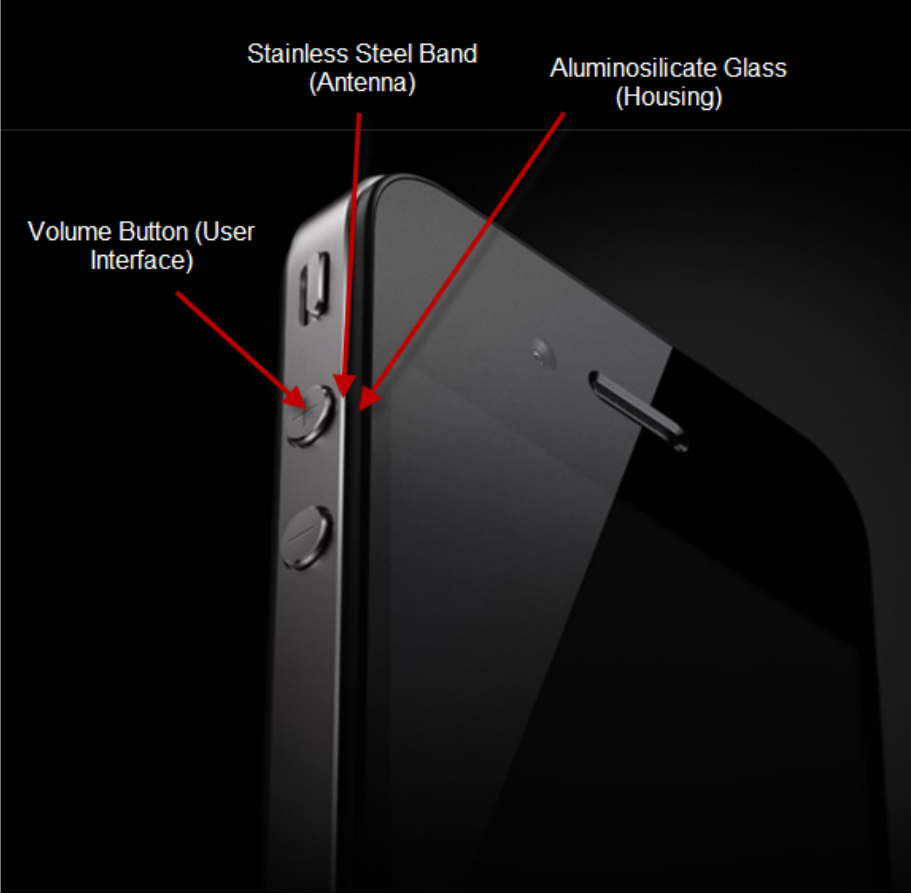
<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	 <ul style="list-style-type: none"><li>● On the top of logic board:<ul style="list-style-type: none"><li>● Skyworks SKY77542 Tx-Rx iPAC™ FEM for Dual-Band GSM/GPRS: 880–915 MHz and 1710–1785 MHz bands.</li><li>● Skyworks SKY77541 GSM/GRPS Front End Module</li><li>● STMicro STM33DH 3-axis accelerometer</li><li>● TriQuint TQM676091</li><li>● 338S0626</li></ul></li></ul>

<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	<p>See also iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127208 (arrows and labels added):</p>  <p>View huge Image metadata</p> <p>Housing</p> <p>Non-conductive Aluminosilicate Glass</p> <p>Receiver Circuitry</p> <p>first image</p> <p>ifixit</p>
<p>an antenna coupled to the receiver circuitry;</p>	<p>Upon information and belief, the Apple iPhone 4 contains a cellular antenna and a Wi-Fi and Bluetooth antenna, each of which is coupled to the receiver circuitry. The stainless steel band on the outside of the iPhone 4 is coupled to and is part of both of the iPhone 4 antennas.</p>

<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	<p>See, e.g., iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949:</p> <div data-bbox="443 409 1644 652">  <p><b>Stainless Steel Band</b>          Created from our own alloy, then forged to be five times stronger than standard steel, the CNC-machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas.</p> </div> <p>See also iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193:</p> <div data-bbox="457 802 1203 1365">  </div> <div data-bbox="1226 805 1623 1154"> <p><b>Step 14</b></p> <ul style="list-style-type: none"> <li>● Apple has integrated the UMTS, GSM, GPS, Wi-Fi, and Bluetooth antennas into the stainless steel inner frame.</li> <li>● The dual purpose stainless steel inner frame/antenna assembly addresses possibly the two biggest flaws concerning previous iterations of the iPhone: continuous dropped calls and lack of reception.</li> <li>● Apple has gone a step further and tuned the phone to utilize whichever network band is less congested or has the least interference for the best signal quality, regardless of the actual signal strength. Early reports suggest this feature, while buggy in its early stages, will greatly improve the phone's reliability on AT&amp;T's fragile network.</li> </ul> </div>



<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	<p>See also Image of iPhone 4 Antenna, (<a href="http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg">http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127191:</p>  <p>Image: Apple Inc.</p>
<p>wherein the antenna forms a loop surrounding at least a portion of the user interface and is disposed between an outside surface of the housing and the at least a</p>	<p>Upon information and belief, the antenna in the iPhone 4 forms a loop that surrounds a portion of the user interface. and is disposed between an outside surface of the housing and the at least a portion of the user interface.</p> <p>Specifically, the iPhone 4 stainless steel band (the antenna) forms a loop surrounding the volume buttons, the speaker, and the touch-screen interface (each of which is a user interface).</p> <p>See, e.g., Image of iPhone 4 Antenna, (<a href="http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg">http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127191:</p>

‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
<p>portion of the user interface.</p>	<div data-bbox="457 367 1108 870" data-label="Image"> </div> <p data-bbox="457 878 709 906">Image: Apple Inc.</p> <p data-bbox="436 976 1917 1076">In addition, the stainless steel band is disposed between the outside surface of the aluminosilicate glass screen (part of the housing that contains the receiver circuitry) and (1) the volume buttons and (2) the speakers (user interfaces).</p> <p data-bbox="436 1122 1843 1187"><i>See also</i> iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126951 (arrows and labels added):</p>

'987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	 <p data-bbox="443 1227 1839 1295"><i>See also</i> iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949:</p>

‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	<div data-bbox="443 302 1507 516" data-label="Image"> <p><b>Stainless Steel Band</b>            Created from our own alloy, then forged to be five times stronger than standard steel, the CNC-machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas.</p> </div> <p data-bbox="443 557 1881 659"><i>See also</i> (at 745-Apple11543563): "The iPhone 4 antenna is an exterior antenna which doesn't use internal space so we can add more battery in the phone and give it a longer battery life and there's some other advantages as well."</p>
<p>14. A receiver according to claim 13 wherein the user interface further comprises at least one of the following: an acoustic, a visual and tactile interface.</p>	<p>Upon information and belief, the iPhone 4 receiver has visual (a touch-screen display), acoustic (speakers), and tactile (volume control buttons) user interfaces.</p> <p><i>See, e.g.</i>, iPhone 4 Technical Specifications, (<a href="http://www.apple.com/iphone/specs.html">http://www.apple.com/iphone/specs.html</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126659:</p> <div data-bbox="1056 967 1283 1409" data-label="Image"> </div>



<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	<p>See also iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949-50:</p> <div data-bbox="443 444 1507 662">  <p><b>Stainless Steel Band</b> Created from our own alloy, then forged to be five times stronger than standard steel, the CNC-machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas.</p> </div> <div data-bbox="443 696 1436 1151">  <p><b>Mic + Speaker</b> While most phones have only one microphone, iPhone 4 has two. The main mic, located on the bottom next to the dock connector, is for phone calls, voice commands, and memos. The second mic, built into the top near the headphone jack, is for FaceTime calls and for making your phone calls better. It works with the main mic to suppress unwanted and distracting background sounds, such as music and loud conversations. This dual-mic noise suppression helps make every conversation a quiet one.</p> </div>
<p>17. A receiver comprising:</p>	<p>Upon information and belief, Apple imports, manufactures, sells, offers to sell, and uses the Apple iPhone 4, which includes a receiver. For example, the iPhone 4 receives, among other things, telephone calls and text messages.</p> <p>In addition, through its design of the Apple iPhone 4, Apple also induced users of the Apple iPhone 4 to infringe the '987 patent. Apple and Motorola have been in talks since 2007 regarding the licensing of Motorola's patent</p>

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<p>portfolio, and, on information and belief, in accordance with those negotiations, Apple has reviewed said portfolio, including Motorola's '987 Patent. Thus, at least as early as 2007, Apple knew or should have known its actions would induce actual infringement and possessed specific intent to encourage its customers' direct infringement through the design of the Apple iPhone 4. In addition, Apple instructs the users of the Apple iPhone 4 to use it in an infringing manner, including but not limited to by describing infringing uses in its advertisements, promotional materials, labels, and user manuals. <i>See, e.g.</i>, Apple iPhone Bumper – Pink, (<a href="http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk">http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk</a>), accessed on May 9, 2011, MOTO-APPLE-0006037953_127202: “Fits all iPhone 4 models for both AT&amp;T and Verizon.” <i>See also id.:</i></p> <p><b>Apple iPhone 4 Bumper - Pink</b></p> 

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‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	<p>Moreover, through its design of the Apple iPhone 4, Apple also contributes to the infringement of the '987 patent by users of the device. As indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Apple iPhone 4 and the Apple iPhone 4 bumper would contribute to direct infringement of the '987 Patent. Apple knew that the iPhone 4 bumper, a component with no substantial non-infringing use, could be combined with the Apple iPhone 4, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Apple iPhone 4 users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Apple iPhone 4, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. <i>See, e.g.</i>, Apple iPhone Bumper – Pink, (<a href="http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk">http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk</a>), accessed on May 9, 2011, MOTO-APPLE-0006037953_127202: “Fits all iPhone 4 models for both AT&amp;T and Verizon.” <i>See also id.</i>:</p>

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<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<p data-bbox="478 329 856 362"><b>Apple iPhone 4 Bumper - Pink</b></p> 
receiver circuitry;	Upon information and belief, the Apple iPhone 4 has receiver circuitry. For instance, the iPhone contains a logic board containing, among other things:

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<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<ul style="list-style-type: none"><li>● On the top of logic board:<ul style="list-style-type: none"><li>● Skyworks SKY77542 Tx-Rx iPAC™ FEM for Dual-Band GSM/GPRS: 880–915 MHz and 1710–1785 MHz bands.</li><li>● Skyworks SKY77541 GSM/GRPS Front End Module</li><li>● STMicro STM33DH 3-axis accelerometer</li><li>● TriQuint TQM676091</li><li>● 338S0626</li></ul></li></ul> <p>See iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127192-94 9 (arrows and labels added):</p>

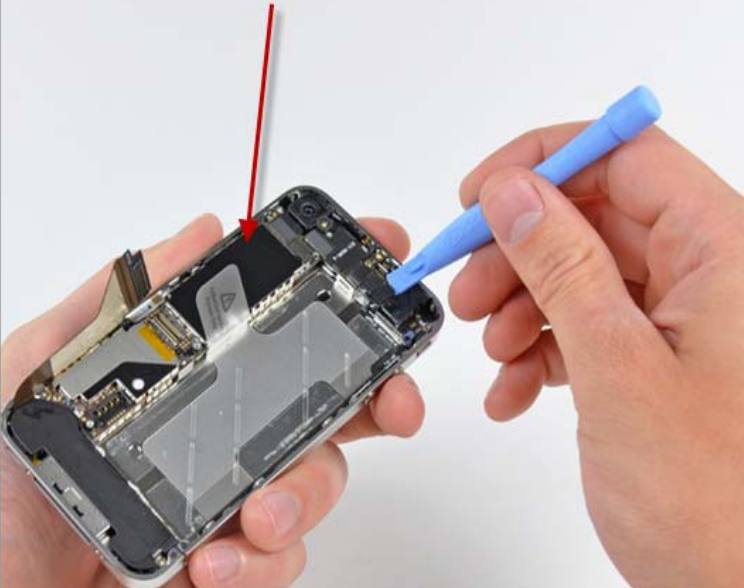

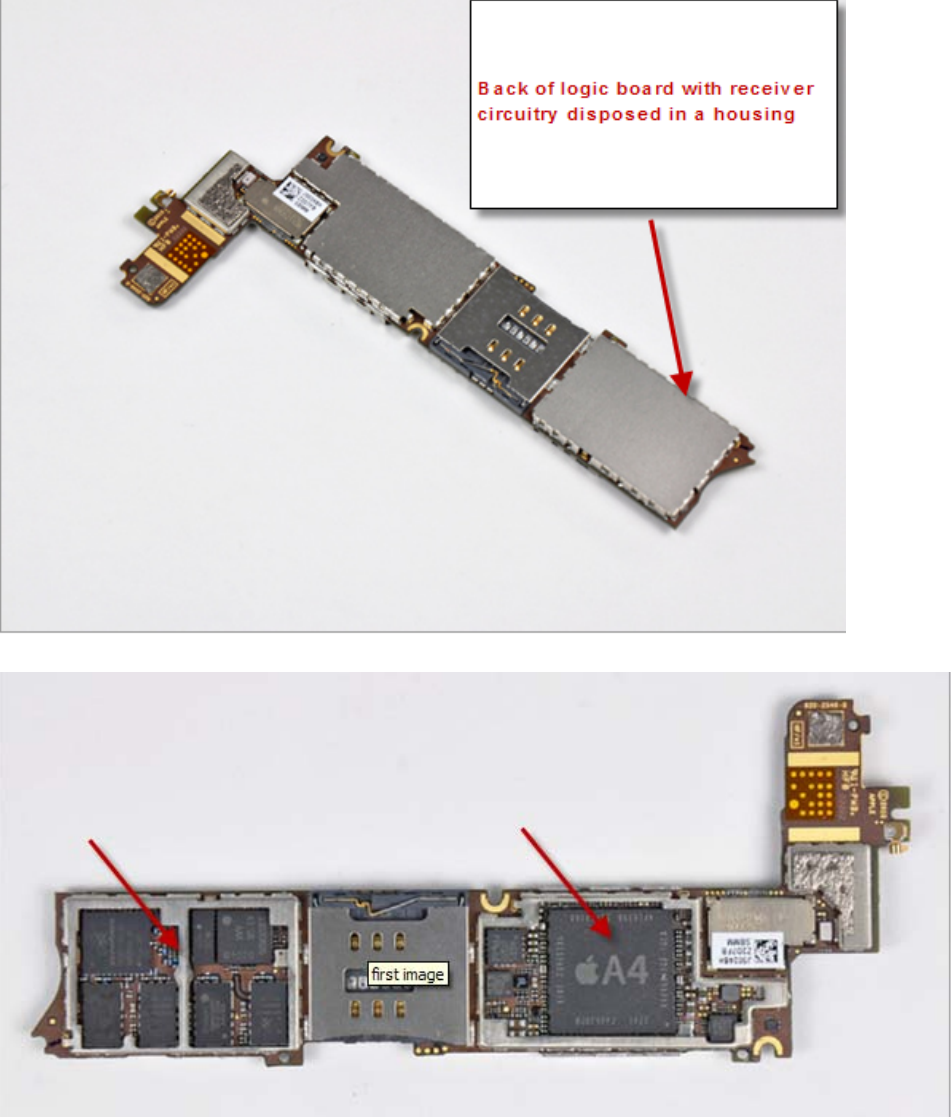
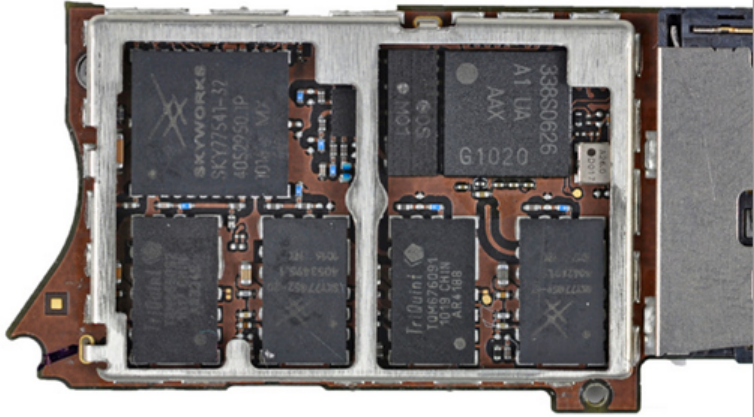
<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>	
		<p><b>Step 10</b></p> <ul style="list-style-type: none"><li>● Removing one of the many connectors on the logic board.</li><li>● In our brief usage, we did notice that the phone is considerably warmer on the right side. This makes sense, as the logic board is located entirely along the right side of the phone.</li></ul>

Exhibit A

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	

'987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	 <p data-bbox="911 305 1276 509">Back of logic board with receiver circuitry disposed in a housing</p> <p data-bbox="806 1263 890 1284">first image</p> <p data-bbox="1016 1214 1079 1235">A4</p>

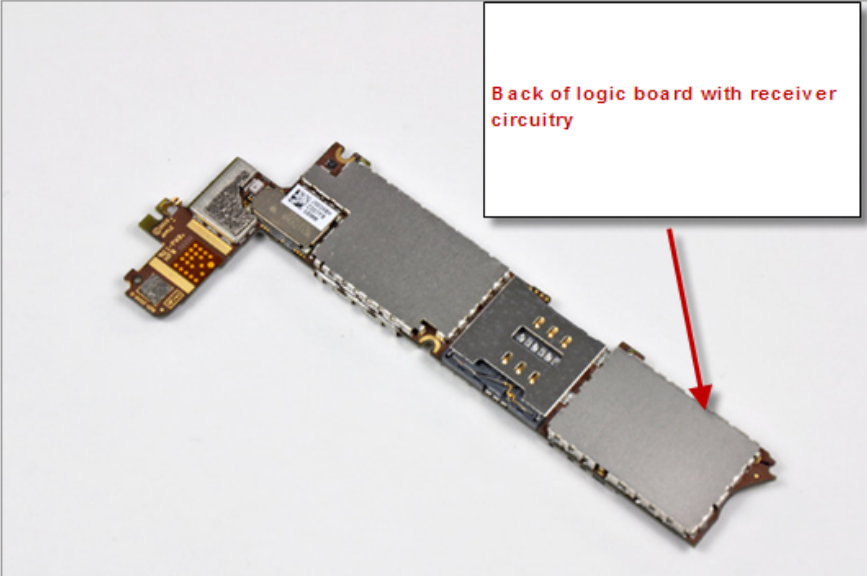


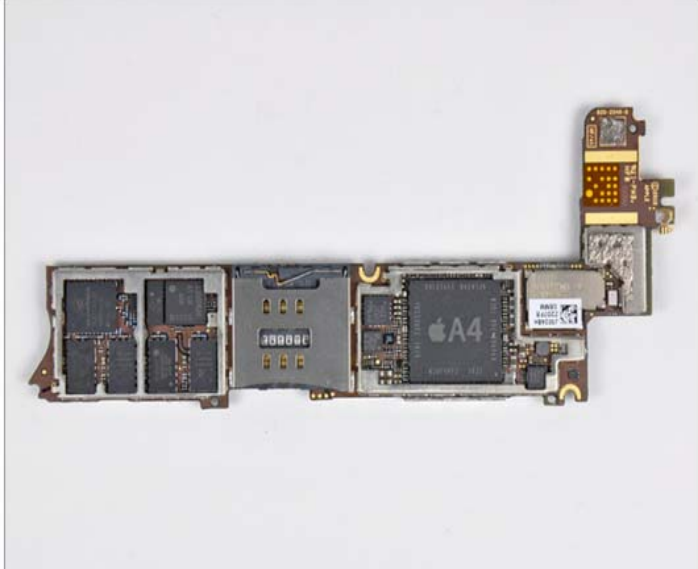
<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	<div style="display: flex; align-items: center;">  <div style="margin-left: 20px;"> <ul style="list-style-type: none"> <li>● On the top of logic board:                     <ul style="list-style-type: none"> <li>● Skyworks SKY77542 Tx-Rx iPAC™ FEM for Dual-Band GSM/GPRS: 880–915 MHz and 1710–1785 MHz bands.</li> <li>● Skyworks SKY77541 GSM/GRPS Front End Module</li> <li>● STMicro STM33DH 3-axis accelerometer</li> <li>● TriQuint TQM676091</li> <li>● 338S0626</li> </ul> </li> </ul> </div> </div>
<p>a housing substantially enclosing the receiver circuitry;</p>	<p>Upon information and belief, the Apple iPhone 4 has a housing, comprised of at least the frame to the inside of the stainless steel band surrounding the iPhone and the non-conductive portion of the aluminosilicate glass screen, substantially enclosing the receiver circuitry.</p> <p><i>See, e.g.,</i> iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127208-10 (arrows and labels added):</p>

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<p data-bbox="451 305 625 362"><a href="#">View huge Image metadata</a></p>  <p data-bbox="823 397 934 430">Housing</p> <p data-bbox="1270 321 1554 386">Non-conductive Aluminosilicate Glass</p> <p data-bbox="1344 860 1470 925">Receiver Circuitry</p> <p data-bbox="997 779 1102 812">first image</p> <p data-bbox="1270 1006 1522 1096"><i>ifixit</i></p>

<p>'987 Patent Claim</p>	<p>Apple iPhone 4<sup>3</sup></p>
	
<p>an electromagnetic shield, disposed</p>	<p>Upon information and belief, the Apple iPhone 4 contains an electromagnetic shield within the housing (comprised of the metal structure inside of the stainless steel band and the aluminosilicate glass covering the front of the iPhone 4) that at least partially covers the receiver circuitry. The electromagnetic shield is formed of an</p>

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<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
in the housing and at least partially covering the receiver circuitry, formed of an electrically conductive, electromagnetic wave-absorbing material for absorbing electromagnetic energy radiated by or towards the receiver circuitry;	<p>electrically conductive, electromagnetic wave-absorbing material for absorbing electromagnetic energy radiated by or towards the receiver circuitry.</p> <p><i>See, e.g.,</i> iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193-94 (arrows, labels, and highlighting added):</p>  <p>The image shows a logic board from an iPhone 4. A red arrow points to a grey rectangular component on the back of the board, which is labeled "Back of logic board with receiver circuitry".</p>

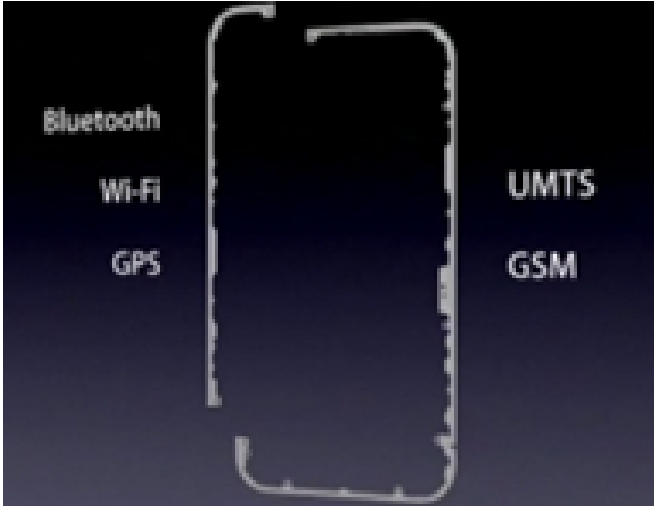
‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	 <p><b>Step 15</b></p> <ul style="list-style-type: none"> <li>● With the EMI shields off, we can get a look at what makes this beast roar.</li> <li>● Lurking deep within the phone, the <b>A4 processor</b>, manufactured by Samsung, is the centralized unit that provides the iPhone 4 with the much needed computing power.</li> <li>● Replacing the Samsung S5PC100 ARM A8 600 MHz CPU used in the 3GS, the new iPhone uses the ARM Cortex A8 core, much like its bigger sibling, the <b>iPad</b>. The iPad's A4 is clocked at 1 Ghz.</li> <li>● The new Samsung Wave S8500 smartphone <b>uses the same Cortex A8 core!</b></li> <li>● Just to the left of the A4 package, the AGD1 is the new 3 axis gyroscope that we believe is designed and manufactured by ST Micro for Apple. The package marks on this device do not appear to be the currently available commercial part, L3G4200D. The commercial version of this gyroscope is yet to be released — Apple got first dibs on it.</li> </ul>
<p>an antenna coupled to the receiver circuitry, carried on an outside, nonconductive surface of the housing and disposed outside the electromagnetic shield; and</p>	<p>Upon information and belief, both Apple iPhone 4 antennas are coupled to the receiver circuitry, and the stainless steel band portion of the antennas is carried on an outside, nonconductive surface of the housing, including at least the non-conductive portion of the aluminosilicate glass screen</p> <p>See e.g., iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126953 (arrows and labels added):</p>

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<p data-bbox="493 332 661 365"><b>Multi-Touch</b></p> <p data-bbox="493 370 829 633">With its large Multi-Touch display and innovative software, iPhone lets you control everything using just your fingers. How does it work? A panel laminated on the glass senses your touch using electrical fields. It can register multiple touches at once to support advanced gestures such as pinch to zoom, two-finger tap, and more. The panel then transmits the information to the Retina display below it.</p>  <p>The diagram shows an iPhone 4 with a red rectangular outline highlighting the top surface. Above the phone, a 3D grid of electrical fields is shown, representing the sensor layer. Two callout boxes on the right side of the diagram point to the sensor layer and the display layer. The top callout box is labeled 'Electrically Conductive Panel' and points to the red-outlined area. The bottom callout box is labeled 'Non-Conductive Aluminosilicate Glass' and points to the area below the red outline.</p> <p data-bbox="1627 495 1900 527">Electrically Conductive Panel</p> <p data-bbox="1627 576 1900 641">Non-Conductive Aluminosilicate Glass</p>

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<p data-bbox="436 305 1879 373"><i>See also</i> iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127209-10:</p>  <p data-bbox="451 462 525 487">first image</p>

<p><b>'987 Patent Claim</b></p>	<p><b>Apple iPhone 4<sup>3</sup></b></p>
	<p>Moreover, at least the stainless steel band portion of the antennas are disposed outside of the electromagnetic shield.</p> <p><i>See, e.g.,</i> iPhone Teardown, (<a href="http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2">http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193:</p> <div data-bbox="453 521 1106 1013"> </div> <div data-bbox="1129 521 1472 829"> <p><b>Step 14</b></p> <ul style="list-style-type: none"> <li>● Apple has integrated the UMTS, GSM, GPS, Wi-Fi, and Bluetooth antennas into the stainless steel inner frame.</li> <li>● The dual purpose stainless steel inner frame/antenna assembly addresses possibly the two biggest flaws concerning previous iterations of the iPhone: continuous dropped calls and lack of reception.</li> <li>● Apple has gone a step further and tuned the phone to utilize whichever network band is less congested or has the least interference for the best signal quality, regardless of the actual signal strength. Early reports suggest this feature, while buggy in its early stages, will greatly improve the phone's reliability on AT&amp;T's fragile network.</li> </ul> </div> <p><i>See, e.g.,</i> iPhone Design, (<a href="http://www.apple.com/iphone/design/">http://www.apple.com/iphone/design/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949:</p> <div data-bbox="443 1159 1507 1377"> <p><b>Stainless Steel Band</b></p> <p>Created from our own alloy, then forged to be five times stronger than standard steel, the CNC-machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas.</p> </div>





‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	<p>See, e.g., Image of iPhone 4 Antenna, (<a href="http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg">http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127191:</p>  <p>Image: Apple Inc.</p> <p>See also (at 745-Apple11543563): "The iPhone 4 antenna is an exterior antenna which doesn't use internal space so we can add more battery in the phone and give it a longer battery life and there's some other advantages as well."</p>
<p>a substantially planar and detachable cover, attached to the outside, nonconductive</p>	<p>Upon information and belief, Apple manufactures, imports, sells, offers to sell, and uses the iPhone 4 “bumper.” The iPhone 4 bumper is a substantially planar and detachable cover. The iPhone 4 bumper is designed to be attached to the outside, non-conductive portion of the aluminosilicate glass screen (part of the housing) that covers the front of the iPhone 4.</p> <p>The iPhone 4 bumper conceals the stainless steel band portion of the antennas between the bumper and the outside,</p>

‘987 Patent Claim	Apple iPhone 4 <sup>3</sup>
<p>surface of the housing, for concealing the antenna between the cover and the outside, nonconductive surface of the housing such that the antenna is unnoticeable to a user of the receiver.</p>	<p>nonconductive surface of the housing (the non-conductive portion of the aluminosilicate glass display) such that the antenna is unnoticeable to a user of the receiver.</p> <p>Apple instructs its customers to attach the iPhone 4 bumper to the outside, nonconductive portion of the aluminosilicate glass display, for concealing the antennas between the bumper and the outside, nonconductive portion of the aluminosilicate glass display.</p> <p><i>See, e.g.</i>, Apple iPhone Bumper – Pink, (<a href="http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk">http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk</a>), accessed on May 9, 2011, MOTO-APPLE-0006037953_127202: “Fits all iPhone 4 models for both AT&amp;T and Verizon.” <i>See also id.</i>:</p> <p><b>Apple iPhone 4 Bumper - Pink</b></p> 

Exhibit A

<b>'987 Patent Claim</b>	<b>Apple iPhone 4<sup>3</sup></b>
	<p>The iPhone 4 bumper is designed specifically for the iPhone 4 and will not fit any other phone. <i>See, e.g., id.</i> “Important note: iPhone 4 Bumpers are compatible only with iPhone 4. They will not work with any other iPhone model.” There is no substantial non-infringing use for the iPhone 4 bumper.</p> <p><i>See also</i> Antennagate Article, (<a href="http://www.msnbc.msn.com/id/38263228/ns/technology_and_science-wireless/t/apple-gives-free-bumpers-all-iphone-owners/">http://www.msnbc.msn.com/id/38263228/ns/technology_and_science-wireless/t/apple-gives-free-bumpers-all-iphone-owners/</a>), accessed on May 12, 2011, MOTO-APPLE-0006037953_126955:</p>

'987 Patent Claim	Apple iPhone 4 <sup>3</sup>
	 <p data-bbox="1136 784 1262 800">Paul Sakuma / AP</p> <p data-bbox="604 813 1199 854">Apple CEO Steve Jobs talks about the Apple iPhone 4 at Apple headquarters in Cupertino, Calif., Friday, July 16, 2010.</p> <p data-bbox="489 898 575 954"></p> <p data-bbox="583 898 768 919">By <a href="#">Wilson Rothman</a></p> <p data-bbox="489 971 716 1008">msnbc.com updated 7/16/2010 1:51:53 PM ET</p> <p data-bbox="1136 987 1377 1008"><a href="#">Share</a>   <a href="#">Print</a>   Font: <a href="#">A</a> <a href="#">+</a> <a href="#">-</a></p> <p data-bbox="489 1049 1377 1170">Today, as expected, Steve Jobs announced that Apple would offer free rubber "bumpers" to anyone who bought an iPhone 4 in order to fix the problem caused by the antenna's design flaw. However, Jobs did not promise a hardware fix which would alleviate the problem without marring the phone's aesthetic.</p> <p data-bbox="489 1206 1377 1263">"We're not perfect," Jobs told reporters. "Phones aren't perfect either," adding, "but we want to make all of our users happy."</p>