

**UNITED STATES PATENT NO. 5,754,119**

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

**Accused Apple Products:**<sup>2</sup> MobileMe, iCloud, Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4, Apple iPhone 4S, Apple iPad with 3G, Apple iPad 2 with 3G, and Apple iPod Touch.

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
1. A method of synchronizing message information among a plurality of transceivers comprising the steps of:	Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim. Apple’s MobileMe / iCloud service with an Apple iPhone practices a method of synchronizing message information among a plurality of transceivers:

<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> Mobility reserves the right to supplement this list of Accused Apple Products.


<sup>3</sup> This chart provides Motorola’s infringement analysis for the MobileMe and / or iCloud service communicating with Apple's accused products. In this claim chart, "Apple iPhone" refers to Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4, Apple iPhone 4S, Apple iPad with 3G, Apple iPad 2 with 3G, and Apple iPod Touch. Upon information and belief, the analysis set forth in this chart for "Apple iPhone" applies equally to the Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4G, Apple iPad with 3G, Apple iPad 2 with 3G, and Apple iPod Touch.

‘119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone <sup>3</sup>
	<div data-bbox="627 306 1157 435"> <h2>Mail, Contacts, and Calendar</h2> </div> <div data-bbox="627 480 1203 722"> <p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p> </div> <div data-bbox="632 794 1205 1023">  </div> <div data-bbox="1241 310 1871 987">  </div> <div data-bbox="585 1060 1892 1130"> <p>MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p> </div> <div data-bbox="585 1170 1843 1203"> <p>See also iPhone User Guide for iPhone OS 3.1 Software, at MOTO-APPLE-0006037953_126971:</p> </div>



‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p data-bbox="865 269 1104 297"><b>Setting Up Accounts</b></p> <p data-bbox="865 302 1650 444">MobileMe and Microsoft Exchange provide not only email, but contact and calendar information that can be synced to iPhone automatically, over the air. MobileMe can also sync your bookmarks on iPhone with Safari on a Mac, or with Safari or Microsoft Internet Explorer on a PC. You set up MobileMe, Exchange, and other email accounts directly on iPhone.</p> <p data-bbox="590 500 1850 602"><i>See also</i> MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p> <p data-bbox="604 662 1050 690"><b>How MobileMe syncing works</b></p> <p data-bbox="604 737 1902 899">MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact's phone number on your iPhone, and it differs from the contact's number stored on your iDisk.</p> <p data-bbox="625 976 1881 1133">If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p data-bbox="590 1214 1885 1317"><i>See also</i> MobileMe on you iPhone or iPod touch, (<a href="http://www.apple.com/mobileme/features/iphone.html">http://www.apple.com/mobileme/features/iphone.html</a>), accessed on May 16, 2011, MOTO-APPLE-0006037953_126654:</p>

Exhibit B

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p><b>Always up to date.</b></p> <p>As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You’re notified as soon as it arrives, so you don’t have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date.</p> <p><i>See also</i> What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:</p>

‘119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone <sup>3</sup>
	<p data-bbox="604 266 800 289">November 5, 2008</p> <h3 data-bbox="831 266 1394 297">What Is IMAP and Why Do We Use It?</h3> <p data-bbox="831 315 1486 591">There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p data-bbox="831 631 1770 911">The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p data-bbox="831 951 1770 1068">With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p data-bbox="590 1117 1896 1182"><u>See also</u>, iCloud – Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p>

‘119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone <sup>3</sup>
	<div data-bbox="667 289 926 407" data-label="Image"> </div> <div data-bbox="825 345 926 391" data-label="Text"> <p>Mail</p> </div> <div data-bbox="667 451 1052 480" data-label="Section-Header"> <p><b>Mail that delivers. Free.</b></p> </div> <div data-bbox="667 500 1776 602" data-label="Text"> <p>When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p> </div> <div data-bbox="590 711 1892 1105" data-label="Text"> <p>In addition, through its design of the Accused Apple Products, Apple also induced users of the Accused Apple Products to infringe the '119 patent. Apple and Motorola have been in talks since 2007 regarding the licensing of Motorola's patent portfolio, and, on information and belief, in accordance with those negotiations, Apple has reviewed said portfolio, including Motorola's '119 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 Accused Apple products. In addition, Apple instructs the users of the Accused Apple Products to use them 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> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p> </div>

‘119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone <sup>3</sup>
	<div data-bbox="625 305 1159 435"> <h2>Mail, Contacts, and Calendar</h2> </div> <div data-bbox="625 480 1203 724"> <p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p> </div> <div data-bbox="632 792 1205 1024">  </div> <div data-bbox="1241 310 1871 987">  </div> <div data-bbox="583 1060 1856 1170"> <p>See also, e.g. MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p> </div>

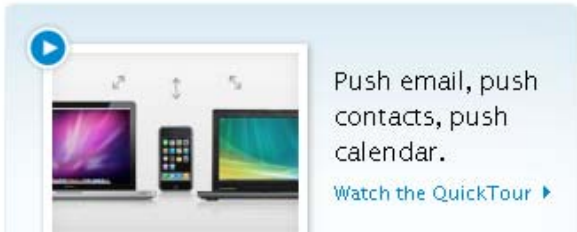




‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p><b>How MobileMe syncing works</b></p> <p>MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact’s phone number on your iPhone, and it differs from the contact’s number stored on your iDisk.</p> <p>If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p><i>See also, iCloud – Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</i></p> <div data-bbox="667 967 926 1084" data-label="Image"> <p><b>Mail</b></p> </div> <p><b>Mail that delivers. Free.</b></p> <p>When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you’re using.</p> <p>Moreover, Apple also contributes to the infringement of the '119 patent by users of the device. As</p>



Exhibit B

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	<p>indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Accused Apple Products would contribute to direct infringement of the '119 Patent. Apple knew that the Accused Apple Products contain a specific synchronization software component, a component with no substantial non-infringing use, that could be combined with Apple's MobileMe / iCloud service, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Accused Apple Products users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Accused Apple Products, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. <i>See e.g.</i> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p>


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	<div data-bbox="627 306 1157 435"> <h2>Mail, Contacts, and Calendar</h2> </div> <div data-bbox="627 480 1201 722"> <p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p> </div> <div data-bbox="632 794 1205 1023">  </div> <div data-bbox="1241 310 1871 987">  </div> <div data-bbox="585 1060 1854 1167"> <p>See also, e.g. MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p> </div>

<p><b>'119 Patent Claim</b></p>	<p><b>Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b></p>
	<p><b>How MobileMe syncing works</b></p> <p>MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact's phone number on your iPhone, and it differs from the contact's number stored on your iDisk.</p> <p>If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p><i>See also</i>, iCloud – Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p> <div style="text-align: center;">  <p><b>Mail</b></p> </div> <p><b>Mail that delivers. Free.</b></p> <p>When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p>
<p>transmitting by a wireless</p>	<p>Upon information and belief, MobileMe / iCloud transmits by a wireless messaging structure a first</p>

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
<p>messaging infrastructure a first message having a first status;</p>	<p>message having a first status. For example, this first message could be an email (a first message) that has a status of the email being "Unread" (a first status). This first message could also be a calendar event, or a contact information.</p> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, "Checking and Reading Email," MOTO-APPLE-0006037953_126750: "When you open a mailbox, Mail retrieves and displays the most recent messages, and shows the number of unread messages at the top of the screen. Unread messages have a blue dot next to them . . . . If you organize messages by thread, related messages appear as a single entry in the mailbox. Message threads have a number next to the right arrow, showing the number of messages in the thread. A blue dot indicates that one or more messages in the thread are unread."</p> <div data-bbox="627 688 1312 1195" style="text-align: center;"> </div> <p>See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188:</p>

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p style="text-align: center;"><b>Push email</b></p> <p>When you join MobileMe, you get a me.com email account that’s always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you’re notified the instant they arrive. MobileMe constantly checks for new messages, so you don’t have to. And when you use MobileMe, you’ll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That’s because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p style="text-align: center;">The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more</a> ▶</p>
<p>in one transceiver of the plurality of transceivers, changing the first status of the first message to a second status responsive to an input to the one transceiver, and transmitting a second message indicative of the second status;</p>	<p>Upon information and belief, in an Apple iPhone, (one transceiver of the plurality of transceivers), changing changes the first status of the first message to a second status responsive to an input to the one transceiver, and transmitting a second message indicative of the second status. The first message could be an email, calendar appointment, or a contact.</p> <p>For example, in an Apple iPhone, if the first message was an email, the from "Unread" (the first status) to "Read" in response to the user selecting the email in the Mail.app of iOS.(an input to the one transceiver), and transmits a second message indicative of the email's status of "Unread" (the second status). Additionally, in an Apple iPhone, (one transceiver of the plurality of transceivers), the status of the email changes from "Unread" (the first status) to "Deleted" in response to the user deleting the email in the Mail.app of iOS (an input to the one transceiver), and transmits a second message</p>



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	<p>indicative of the email's status of "Deleted" (the second status):</p> <p style="text-align: center;"><b>Push email</b></p> <p style="text-align: center;">When you join MobileMe, you get a me.com email account that's always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you're notified the instant they arrive. MobileMe constantly checks for new messages, so you don't have to. And when you use MobileMe, you'll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That's because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p style="text-align: center;">The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more ▶</a></p> <p>See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.</p> <p>See also What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:</p>


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	<p data-bbox="604 266 800 289">November 5, 2008</p> <h3 data-bbox="831 266 1394 297">What Is IMAP and Why Do We Use It?</h3> <p data-bbox="831 315 1486 591">There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p data-bbox="831 631 1770 911">The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p data-bbox="831 951 1770 1068">With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p>
<p data-bbox="197 1117 575 1365">in the wireless messaging infrastructure, receiving the second message, and responsive to receiving the second message, transmitting a third message indicative of the second status; and</p>	<p data-bbox="590 1117 1850 1218">Upon information and belief, MobileMe / iCloud's wireless messaging infrastructure) receives the second message, and responsive to the second message, transmits a third message indicative of the second status.</p> <p data-bbox="590 1263 1902 1403">For example, where the first message was an email, MobileMe's IMAP server (the wireless messaging infrastructure) receives the second message. In response to the receipt of the second message, the IMAP server transmits a third message indicative of the email's status of "Unread" or "Deleted" (the second status). Indeed, but for the receipt of the second message, the third message would not have</p>




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	<p>been sent. <i>See, e.g.,</i> Apple’s Markman slides for ‘119 patent at 45-49; Markman Transcript 443:20-445:9.</p> <p style="text-align: center;"><b>Push email</b></p> <p>When you join MobileMe, you get a me.com email account that’s always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you’re notified the instant they arrive. MobileMe constantly checks for new messages, so you don’t have to. And when you use MobileMe, you’ll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That’s because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p>The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more ▶</a></p> <p><i>See</i> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.</p> <p><i>See also</i> MobileMe on your iPhone or iPod touch, (<a href="http://www.apple.com/mobileme/features/iphone.html">http://www.apple.com/mobileme/features/iphone.html</a>), accessed on May 16, 2011, MOTO-APPLE-0006037953_126654:</p>

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p><b>Always up to date.</b></p> <p>As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You’re notified as soon as it arrives, so you don’t have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date.</p> <p><i>See also</i> iPhone User Guide for iPhone OS 3.1 Software, at MOTO-APPLE-0006037953_126971:</p> <p><b>Setting Up Accounts</b>          MobileMe and Microsoft Exchange provide not only email, but contact and calendar information that can be synced to iPhone automatically, over the air. MobileMe can also sync your bookmarks on iPhone with Safari on a Mac, or with Safari or Microsoft Internet Explorer on a PC. You set up MobileMe, Exchange, and other email accounts directly on iPhone.</p> <p><i>See also</i> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:</p>

‘119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone <sup>3</sup>
	<div data-bbox="625 305 1159 435"> <h2>Mail, Contacts, and Calendar</h2> </div> <div data-bbox="625 480 1205 724"> <p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p> </div> <div data-bbox="632 792 1205 1024">  <p>Push email, push contacts, push calendar.  <a href="#">Watch the QuickTour ▶</a></p> </div> <div data-bbox="1241 310 1871 987">  </div> <div data-bbox="583 1060 1892 1167"> <p>See also What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:</p> </div>



‘119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone <sup>3</sup>
	<p data-bbox="604 266 800 289">November 5, 2008</p> <h3 data-bbox="831 266 1392 297">What Is IMAP and Why Do We Use It?</h3> <p data-bbox="831 318 1486 589">There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p data-bbox="831 634 1770 911">The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p data-bbox="831 951 1770 1065">With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p data-bbox="590 1117 1896 1182"><i>See also</i>, iCloud – Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p>


<p><b>'119 Patent Claim</b></p>	<p><b>Representative Apple Product: Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b></p>
	<div data-bbox="667 289 926 407">  <p><b>Mail</b></p> </div> <div data-bbox="667 451 1776 602"> <p><b>Mail that delivers. Free.</b>                  When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p> </div>
<p>in at least one other transceiver of the plurality of transceivers, receiving the third message, and responsive to receiving the third message, changing the first status of the first message to the second status.</p>	<p>Upon information and belief, at least one other Apple iPhone receives the third message, and responsive to receiving the third message, changes the first status of the first message to the second status.</p> <p>For example, where the first message was an email, the first status of the email changes from "Unread" to "Read" or "Deleted" (the second status):</p>


‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p data-bbox="936 269 1163 310"><b>Push email</b></p> <p data-bbox="936 323 1577 813">When you join MobileMe, you get a me.com email account that’s always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you’re notified the instant they arrive. MobileMe constantly checks for new messages, so you don’t have to. And when you use MobileMe, you’ll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That’s because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p data-bbox="936 862 1549 922">The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more</a> ▶</p> <p data-bbox="590 971 1829 1036"><i>See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.</i></p> <p data-bbox="590 1081 1885 1182"><i>See also MobileMe on you iPhone or iPod touch, (<a href="http://www.apple.com/mobileme/features/iphone.html">http://www.apple.com/mobileme/features/iphone.html</a>), accessed on May 16, 2011, MOTO-APPLE-0006037953_126654:</i></p>

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p><b>Always up to date.</b></p> <p>As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You’re notified as soon as it arrives, so you don’t have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date.</p> <p><i>See also</i> MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p> <p><b>How MobileMe syncing works</b></p> <p>MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact’s phone number on your iPhone, and it differs from the contact’s number stored on your iDisk.</p>



‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p>If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p>See also Exhibit MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:</p> <h2 style="text-align: center;">Mail, Contacts, and Calendar</h2> <p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div data-bbox="632 1079 1205 1308" style="border: 1px solid #ccc; padding: 5px; background-color: #f0f8ff;">  </div> <div data-bbox="1241 597 1864 1273" style="text-align: center;">  </div> </div> <p>See also What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed</p>

<p><b>'119 Patent Claim</b></p>	<p><b>Representative Apple Product:</b> Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></p>
	<p>on May 5, 2011, MOTO-APPLE-0006037953_126657:</p> <p>November 5, 2008 <b>What Is IMAP and Why Do We Use It?</b></p> <p>There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p>The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p>With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p><i>See also</i>, iCloud – Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p>

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	 <p data-bbox="825 347 926 391"><b>Mail</b></p> <p data-bbox="667 451 1050 480"><b>Mail that delivers. Free.</b></p> <p data-bbox="667 500 1776 602">When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p>
<p data-bbox="191 711 569 922">2. The method according to claim 1 wherein the first status is an unread status and the second status is includes read, deleted, or protected status.</p>	<p data-bbox="583 711 1896 963">Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim, has actively induced users to perform such steps, and has contributed to such use by selling the accused products and providing directions for their use. Apple’s MobileMe / iCloud service with an Apple iPhone practice a method according to claim 1 wherein the first status is an unread status and the second status is includes read, deleted, or protected status.</p> <p data-bbox="583 1003 1896 1068">As discussed above in Claim 1, MobileMe / iCloud will transmit to an Apple iPhone an email that has a first status of "Unread."</p> <p data-bbox="583 1109 1822 1182">When a user of an Apple iPhone selects or deletes a message in the Mail.App of iOS, the email's status changes to a second status of "Read" or "Deleted." <i>See</i> Claim 1 contentions above.</p>
<p data-bbox="191 1263 541 1401">5. A method of synchronizing a status of a plurality of transceivers comprising the steps of:</p>	<p data-bbox="583 1263 1875 1401">Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim. Apple’s MobileMe / iCloud service with an Apple iPhone practice a method of</p>

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
	<p>synchronizing message information among a plurality of transceivers. <i>See</i> Claim 1 contentions above.</p> <p>In addition, through its design of the Accused Apple Products, Apple also induced users of the Accused Apple Products to infringe the '119 patent. Apple and Motorola have been in talks since 2007 regarding the licensing of Motorola's patent portfolio, and, on information and belief, in accordance with those negotiations, Apple has reviewed said portfolio, including Motorola's '119 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 Accused Apple products. In addition, Apple instructs the users of the Accused Apple Products to use them in an infringing manner, including but not limited to by describing infringing uses in its advertisements, promotional materials, labels, and user manuals. <i>See</i> Claim 1 contentions above.</p> <p>Moreover, Apple also contributes to the infringement of the '119 patent by users of the device. As indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Accused Apple Products would contribute to direct infringement of the '119 Patent. Apple knew that the Accused Apple Products contain a specific synchronization software component, a component with no substantial non-infringing use, that could be combined with Apple's MobileMe / iCloud service, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Accused Apple Products users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Accused Apple Products, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. <i>See</i> Claim 1 contentions above.</p>
<p>in a first transceiver, changing the status of the first transceiver from a first status to a second status as a result of an input from a user, and transmitting a first message indicative of the</p>	<p>Upon information and belief, in a first transceiver connected to the MobileMe / iCloud network the status of the first transceiver changes from a first status to a second status as a result of an input from a user, and transmits a first message indicative of the second status.</p> <p>For example, an Apple iPhone, (first transceiver) can, as a result of input from a user, can change the status of email, calendar, or contact information (first status) to reflect, <i>e.g.</i>, email deletions, new calendar appointments, and/or new contacts (second status) and transmit a first message indicative of</p>

Exhibit B

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an iPhone<sup>3</sup></b>
second status;	the second status to the MobileMe / iCloud IMAP server. <i>See</i> Claim 1 contentions above.
in a wireless messaging infrastructure, receiving the first message, and transmitting a second message indicative of the second status; and	<p>Upon information and belief, MobileMe / iCloud's wireless messaging infrastructure, receives the first message, and transmits a second message indicative of the second status.</p> <p>To continue the above example, MobileMe / iCloud's IMAP server (the wireless messaging infrastructure) receives the first message. In response to the receipt of the first message, the IMAP server transmits a second message indicative of the second status, <i>e.g.</i>, any email deletions, new calendar appointments, and/or new contacts (second status). Indeed, but for the receipt of the second message, the third message would not have been sent. <i>See, e.g.</i>, Apple's Markman slides for '119 patent at 45-49; Markman Transcript 443:20-445:9. <i>See</i> Claim 1 contentions above.</p>
in a second transceiver, receiving the second message, and changing a status of the second transceiver to the second status in response thereto.	<p>Upon information and belief, a second transceiver connected to the MobileMe / iCloud network receives the second message, and changes a status of the second transceiver to the second status in response thereto.</p> <p>To continue the above example, a second Apple iPhone receives the second message transmitted by the MobileMe / iCloud IMAP server, and in response thereto, changes the status of, <i>e.g.</i>, any email, calendar, or contact information to reflect any email deletions, new calendar appointments, and/or new contacts (second status). <i>See</i> Claim 1 contentions above.</p>