Exhibit C   **PUBLIC REDACTED VERSION**

UNITED STATES PATENT NO. 5,958,006

SUPPLEMENTAL INFRINGEMENT CONTENTIONS[1]

Accused Apple Products:[2] MobileMe, iCloud, Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4, Apple iPhone 4S, Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, Apple iPod Touch, Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro.

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
12. A method of communicating data between a first data processing device and a third data processing device via	Upon information and belief, an Apple Phone in the course of normal use with MobileMe / iCloud and an Apple Computer in the course of normal use with MobileMe / iCloud perform each and every step of this claim. Additionally, a user of an Apple Phone or an Apple Computer will performs each and every step of this claim in the course of such use.

---

[1]   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.

[2]   Motorola reserves the right to supplement this list of Accused Apple Products.

[3]   This chart provides Motorola's infringement analysis for the MobileMe service and/or iCloud communicating with Apple's accused products. In this claim chart, "Apple Phone" refers to Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4, Apple iPhone 4S. Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, and Apple iPod Touch; whereas "Apple Computer" refers to Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro. Upon information and belief, the analysis set forth in this chart for "Apple Phone" applies equally to the Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4, Apple iPhone 4S, Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, and Apple iPod Touch; whereas, upon information and belief, the analysis set forth in this chart for "Apple Computer" applies equally to the Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro.

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
a second data processing device, comprising:	Upon information and belief, Apple Phones and Apple Computers perform a method of communicating data between a first data processing device (MobileMe / iCloud host server) and a third data processing device (Apple Phone) via a second processing device (MobileMe / iCloud communication server). MobileMe Features, (http://www.apple.com/mobileme/features/), accessed May 13, 2011, MOTO-APPLE-0006037953_127187. *See* What is Mac OS X – Mail, iCal, Address Book, (http://www.apple.com/macosx/what-is-macosx/mail-

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
	ical-address-book.html), accessed May 14, 2011, MOTO-APPLE-0006037953_127173-74: *See also* iPhone Features, (http://www.apple.com/iphone/features/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126650-50:

Exhibit C   **PUBLIC REDACTED VERSION**

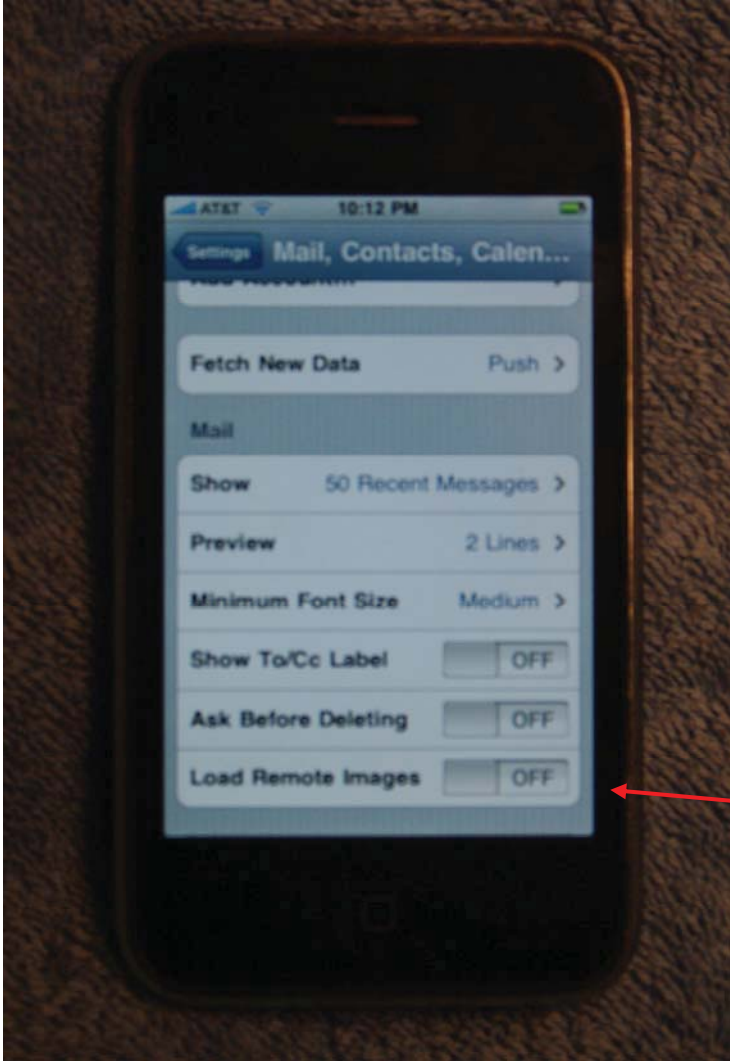| '006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
	Have email, will travel. With Mail on iPhone 4, wherever you go, your email goes too. iPhone works with popular email providers including MobileMe, Yahoo! Mail, Gmail, and AOL — and most industry-standard IMAP and POP mail systems. Add multiple email accounts and move between them easily. iPhone also supports multiple Microsoft Exchange ActiveSync accounts for business use. So even when you're on the go, you can send and receive email. And if you need it in hard copy, AirPrint lets you print messages and attachments with just a few taps.* **Find the hidden message.** Search your email by subject, sender, and recipient. Even search for messages and contacts that aren't stored on your iPhone. Search can find them on your remote email server.

Exhibit C   **PUBLIC REDACTED VERSION**

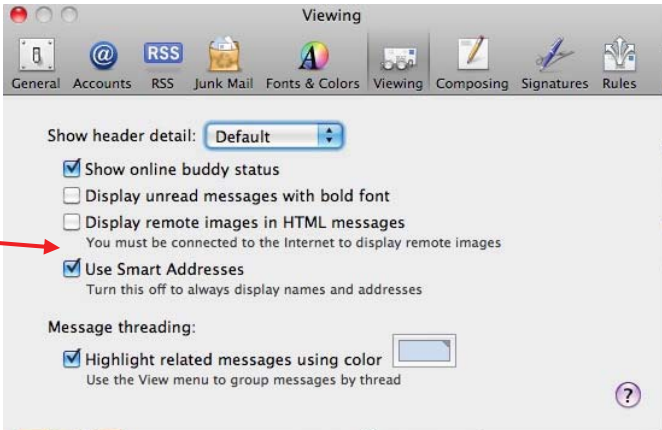| '006 Patent Claim	Representative Apple Products: **Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]**
	See also, iCloud – Calendar, Mail, and Contacts, http://www.apple.com/icloud/features/calendar-mail-contacts.html, accessed on October 27, 2011: **Mail** **Mail that delivers. Free.** 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. In addition, through its design of the Apple Phones and Apple Computers, Apple also induced users of the Accused Apple Products to infringe the '006 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 '006 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 Phones and Apple Computers. In addition, Apple instructs the users of the Apple Phones and Apple Computers 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. *See, e.g.* MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204:

5

Exhibit C   **PUBLIC REDACTED VERSION**

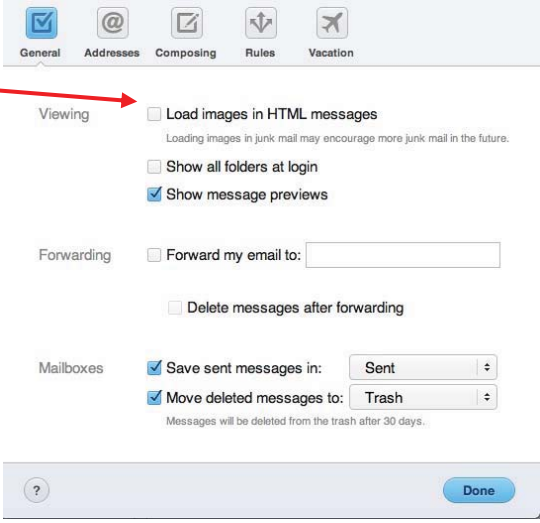| '006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
	■ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu [icon] in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images. Moreover, Apple also contributes to the infringement of the '006 patent by users of the devices. As indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Apple Phones and Apple Computers would contribute to direct infringement of the '006 Patent. Apple knew that the Apple Phones and Apple Computers contain a specific software component for storing information on filtered data units, 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 component was especially made, was both patented and infringing. Moreover, Apple Phones and Apple Computers users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Apple Phones and Apple Computers, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. *See, e.g.* MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204: ■ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu [icon] in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images.
(a) at the second data processing device, controlling communication of	Upon information and belief, the MobileMe communication server (second data processing device) controls communication of non-HTML images (qualifying data units) and HTML images (non-qualifying data units) from the MobileMe host server (first data processing device) to an Apple Phone or an Apple Computer (third

6

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
qualifying and non-qualifying data units from the first data processing device to the third data processing device including	data processing device).

See Screenshot of raw data from a MobileMe indicating MobileMe is a communication server, taken on May 10, 2011, MOTO-APPLE-0006037953_127175 (highlighting added):

```
Return-path:
<return_smverp_.1232082537.1088744.DATABASEID.1169284.929109887.158307._smverp_.XXXXXXX=mac.com@ab.mm.ticketmaster.com>
Received: from smtpin138.mac.com ([10.150.68.138]) by ms02034.mac.com (Oracle Communications Messaging Exchange Server 7u4-21.01
64bit (built Feb 16 2011)) with ESMTP id <0LL0008HF8ZC8P80@ms02034.mac.com>
for XXXXXXXXX@mac.com; Wed, 11 May 2011 00:21:12 +0000 (GMT)
Original-recipient: rfc822;XXXXXXXXX
Received: from sms1-els204-94.mm.ticketmaster.com ([209.104.36.94]) by smtpin138.mac.com (Sun Java(tm) System Messaging Server 7u3-
16.01 64bit (built May 20 2010)) with ESMTP id <0LL000B1F8Z21W20@smtpin138.mac.com> for XXXXXXX@mac.com (ORCPT XXXXXXXXX@mac.com);
Tue, 10 May 2011 17:21:12 -0700 (PDT)
X-Proofpoint-Virus-Version: vendor=fsecure engine=2.50.10432:5.2.15,1.0.148,0.0.0000
definitions=2011-05-10_13:2011-05-11,2011-05-10,1970-01-01 signatures=0
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 spamscore=0 ipscore=0 suspectscore=62 phishscore=0 bulkscore=100
adultscore=0 classifier=spam adjust=0 reason=mlx engine=6.0.2-1012030000
definitions=main-1105100173
Received: from sms1.mm.els204.clisys.tmcs ([10.75.20.63])
        by sms1-els204-94.mm.ticketmaster.com (StrongMail Enterprise 3.2.3(3.00.316)) ; Tue, 10 May 2011 17:21:11 -0700
X-VirtualServer: Default, sms1-els204-94.mm.ticketmaster.com, 10.75.20.62
X-VirtualServerGroup: Default
X-Destination-ID: XXXXXXXXX@mac.com
X-MailingID: 1232082537::1088744::DATABASEID::1169284::929109887::158307
X-SMHeaderMap: mid="X-MailingID"
X-SMFBL: aW5mb19maWVuZEBtYWMuY29t
X-Mailer: StrongMail Enterprise 3.2.3(3.00.316)
Content-type: multipart/alternative;
boundary="----=_NextPart_001_AEA6_74B0DC51.19495CFF"
MIME-version: 1.0
Message-id: <1232082537.158307@BOWERYBALLROOM.COM>
Subject:
=?UTF-8?B?U291bmRnYXJkZW4sIEJvbiBJdmVyLCBCZW4gSGFycGVyICYgbW9yZSBvbiBzYWxlIHRoaXMgd2Vlay4=?=
Date: Tue, 10 May 2011 17:21:11 -0700
To: XXXXXXXXX@mac.com
From: =?UTF-8?B?VGhlIEJvd2VyeSBQcmVzZW50cw==?= <INFO@BOWERYBALLROOM.COM>
```

See also iCloud: How spam is filtered, http://support.apple.com/kb/HT4899, accessed October 27, 2011:

iCloud automatic spam filtering

To minimize spam for iCloud customers, iCloud Mail automatically detects spam before it reaches your Inbox. Spam prevention requires filtering mechanisms that include dynamic lists, trend analysis, and content filtering.

Exhibit C   **PUBLIC REDACTED VERSION**

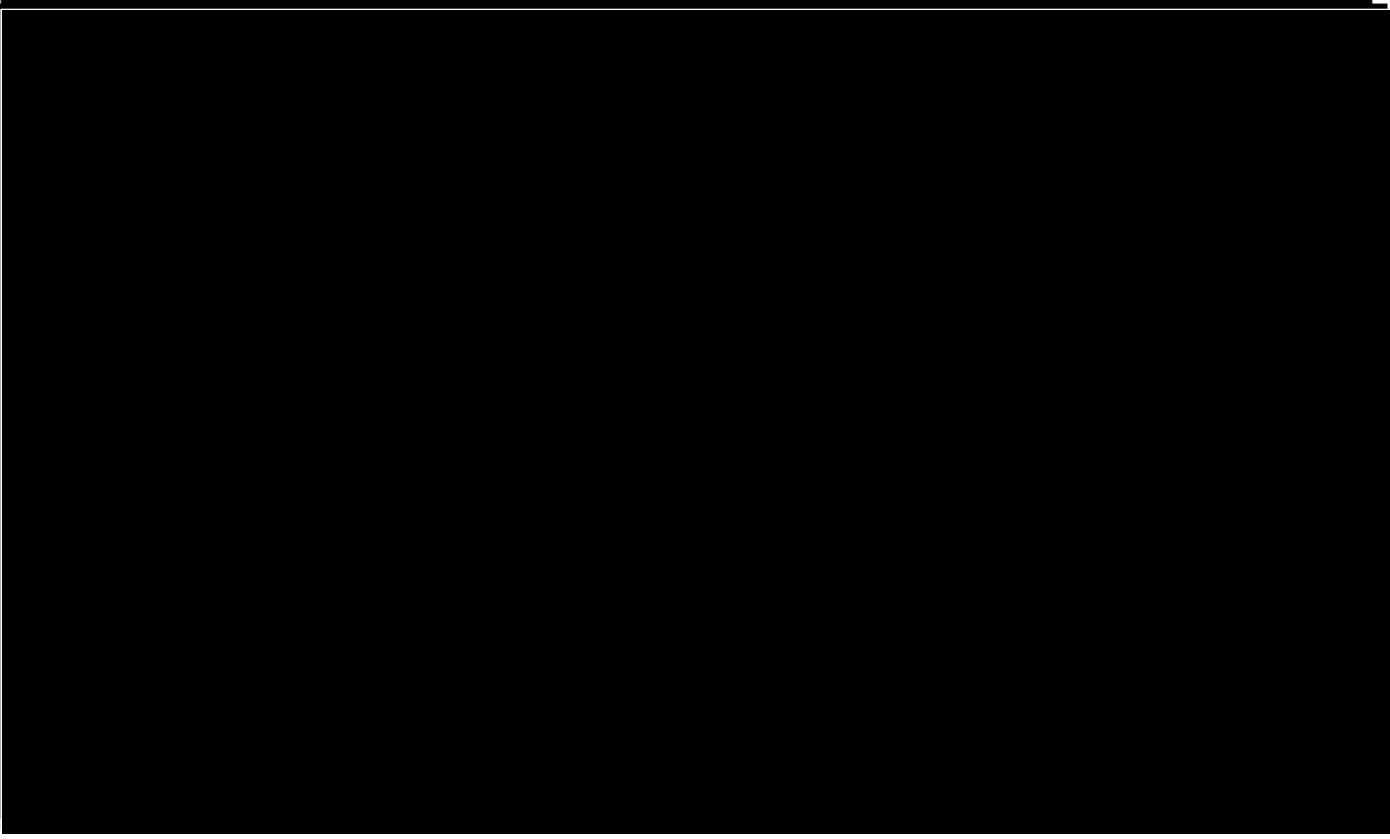| '006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
receiving individually filtered data units from the first data processing device based on at least one user-definable filter parameters to identify whether a data unit is a qualifying or non-qualifying data unit,	Upon information and belief, the MobileMe / iCloud communication server receives individually filtered data units from the MobileMe / iCloud host server (the first data processing device) based on at least whether the data unit is a HTML image (a user-definable filter parameter) to identify whether a data unit is a qualifying or non-qualifying data unit. The user of an Apple Phone can select which mailboxes (and which folders within those mailboxes) are synched to the device. In addition, the user of an Apple Phone can select how many emails should be downloaded to the device, and the user of an Apple Phone can select not to load remote HTML images. MobileMe / iCloud receives any and all of these user-selected criteria previously prepared at the Apple Phone, which are, when completed, sent to the MobileMe / iCloud communication server. For example, when used with an Apple Phone, this is performed by the MobileMe / iCloud communication server when the "load remote images" setting is set to "off" in the Apple Phone Settings App:

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
	Photo of Apple iPhone showing option to load remote images, taken June 29, 2010, MOTO-APPLE-

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
	0006037953_127176 (arrow added). When used with an Apple Computer, this is performed by the MobileMe / iCloud communication server when (1) the "Display remote images in HTML messages" setting is not selected in the Mail App of Apple's OS X operating system or (2) the "Load images in HTML messages" setting is not selected in the Preferences section of the MobileMe web application:

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
	Screenshots of Apple Computer showing options to display images in HTML messages, taken May 12, 2011, MOTO-APPLE-0006037953_127177-78 (arrows added). *See also* MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204: *See also* 745-Apple0783686-786 at -717:

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]

Exhibit C   **PUBLIC REDACTED VERSION**

'006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
wherein for qualifying data units, an identifying information part and an additional part is received and for non-qualifying data units, the identifying	Upon information and belief, for non-HTML images (qualifying data units), the date, subject, sender, etc. (identifying information parts) and the non-HTML images in the email content (the additional part) is received by MobileMe's / iCloud's communication server. For HTML images (non-qualifying data units), the date, subject, sender, etc. (the identifying information parts) without the HTML images (the additional part) are received:

Exhibit C   **PUBLIC REDACTED VERSION**

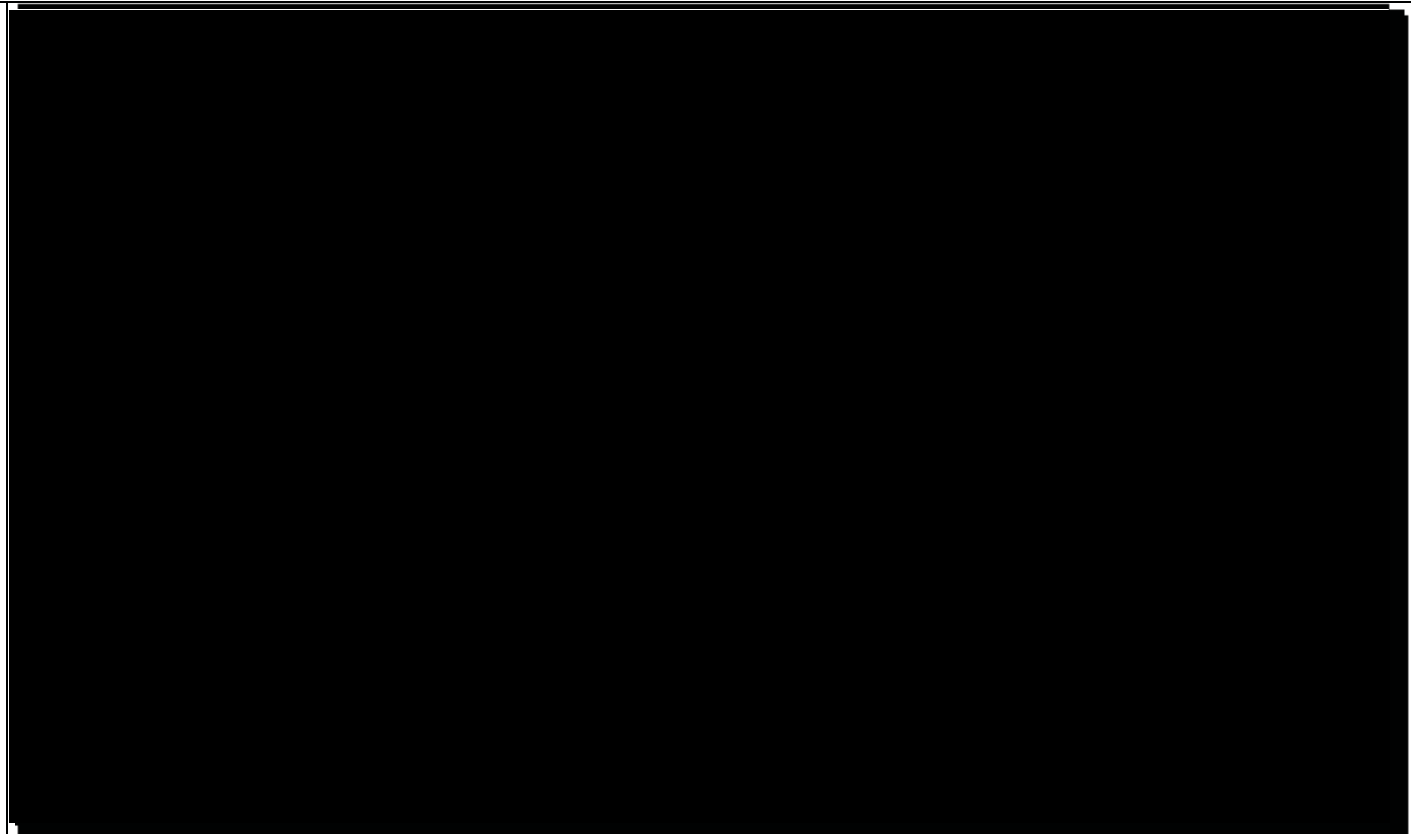| '006 Patent Claim	Representative Apple Products: Apple Phone and/or Apple Computer communicating over MobileMe / iCloud;[3]
information part without the additional part is received,	▪ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ⚙ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images. MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204.

Exhibit C   **PUBLIC REDACTED VERSION**

and providing the third data processing device with the identifying information part and the additional part for qualifying data units and providing the third data processing device with the identifying information part without the additional part for non-qualifying data units.	Upon information and belief, MobileMe's / iCloud's communication server provides an Apple Phone and/or an Apple Computer (the third data processing device) with the date, subject, sender, etc. (the identifying information part) and the non-HTML images in the email content (the additional part) for qualifying data units and provides the Apple Phone and/or an Apple Computer with the identifying information part without the HTML images (the additional part) for non-qualifying data units. *See* MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204: ▪ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu 🔘 in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images. *See also* 745-Apple0783686-786 at -717: ██████████████████████████████████

15

Exhibit C   **PUBLIC REDACTED VERSION**

Exhibit C   **PUBLIC REDACTED VERSION**
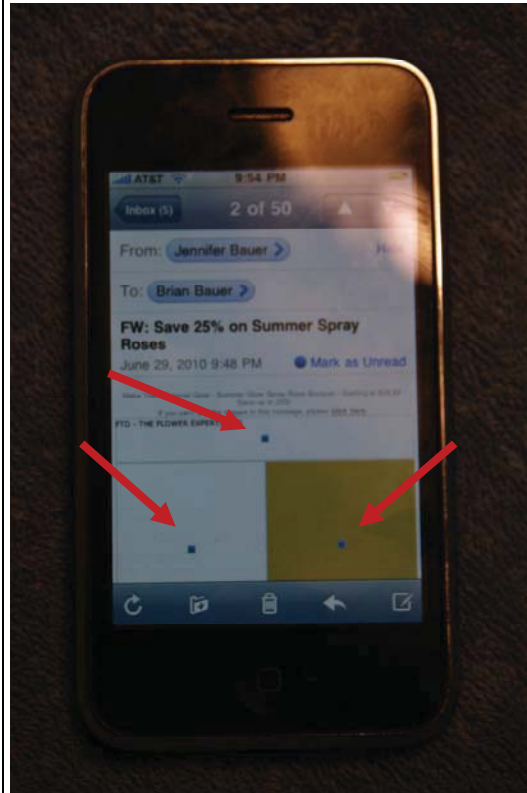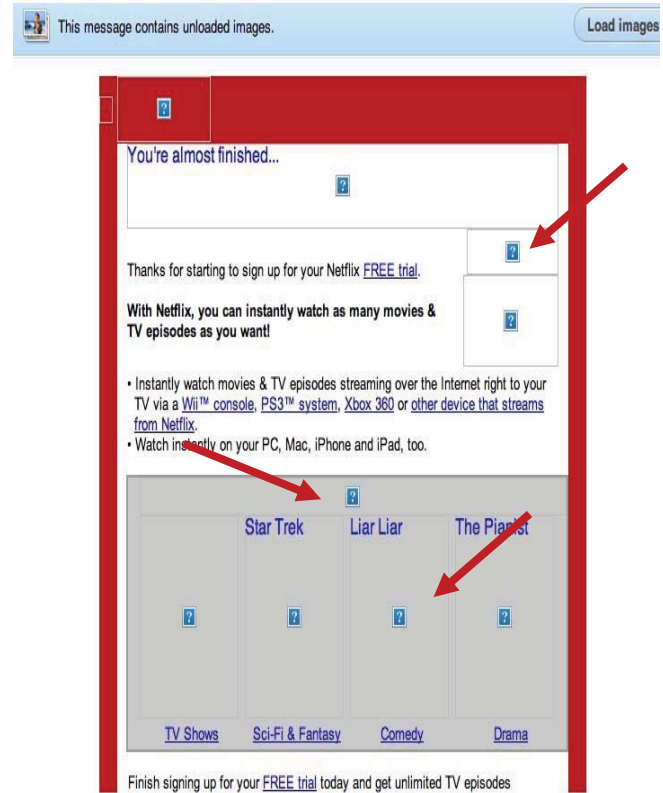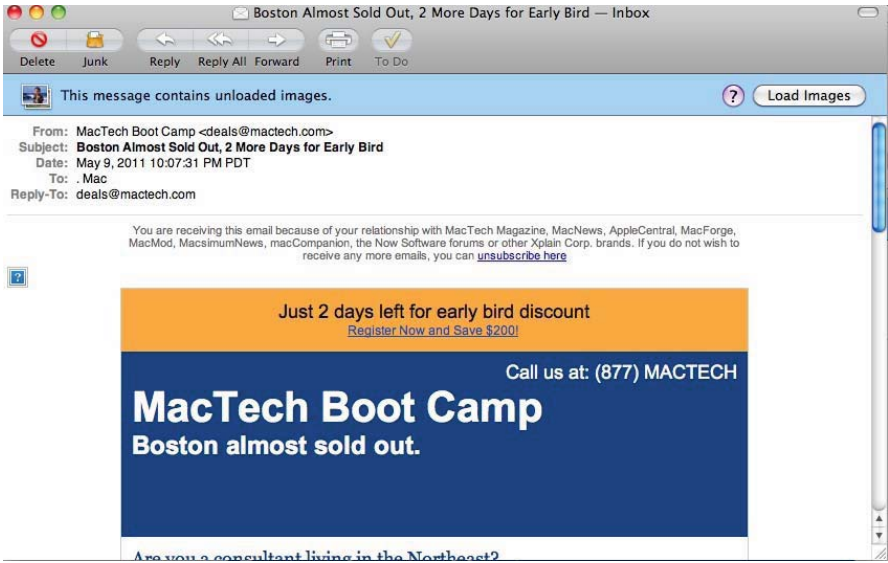

See also Picture of the iPhone showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Phone, taken May 12, 2011, MOTO-APPLE-0006037953_127179 (arrows added); Picture of an Apple Computer showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Computer via the Mail.App in OS X, taken May 12, 2011, MOTO-APPLE-0006037953_127180 (arrows added); Picture of an Apple Computer showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Computer via the MobileMe web application, taken May 12, 2011, MOTO-APPLE-0006037953_127181 (arrows added):

Exhibit C   **PUBLIC REDACTED VERSION**

Apple iPhone Apple	Computer via Mail.App

Exhibit C   **PUBLIC REDACTED VERSION**

Apple Computer via MobileMe web application

26. A controller of a communication unit adapted for requesting data over a wireless communication channel from a further data processing host via a communication server, the controller comprising:	Upon information and belief, Apple sells, offers for sale, manufactures, imports, and uses Apple Phones and Apple Computers, and Apple induces its customers to purchase and use Apple Phones and Apple Computers, which contain a controller and are communication units adapted for requesting data over a wireless communication channel from a further data processing host via a communication server, *e.g.*, the MobileMe / iCloud communication server. *See* Screenshot of raw data from a MobileMe indicating MobileMe is a communication server, taken on May 10, 2011, MOTO-APPLE-0006037953_127175 (highlighting added):

19

Exhibit C   **PUBLIC REDACTED VERSION**

```
Return-path:
<return smverp .1232082537.1088744.DATABASEID.1169284.929109887.158307. smverp .XXXXXXX=mac.com@ab.mm.ticketmaster.com>
Received: from smtpin138.mac.com ([10.150.68.138]) by ms02034.mac.com (Oracle Communications Messaging Exchange Server 7u4-21.01
64bit (built Feb 16 2011)) with ESMTP id <0LL0008HF8ZC8P80@ms02034.mac.com>
for XXXXXXXXX@mac.com; Wed, 11 May 2011 00:21:12 +0000 (GMT)
Original-recipient: rfc822;XXXXXXXXX
Received: from sms1-els204-94.mm.ticketmaster.com ([209.104.36.94]) by smtpin138.mac.com (Sun Java(tm) System Messaging Server 7u3-
16.01 64bit (built May 20 2010)) with ESMTP id <0LL000B1F8Z21W20@smtpin138.mac.com> for XXXXXXX@mac.com (ORCPT XXXXXXXXX@mac.com);
Tue, 10 May 2011 17:21:12 -0700 (PDT)
X-Proofpoint-Virus-Version: vendor=fsecure engine=2.50.10432:5.2.15,1.0.148,0.0.0000
definitions=2011-05-10_13:2011-05-11,2011-05-10,1970-01-01 signatures=0
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 spamscore=0 ipscore=0 suspectscore=62 phishscore=0 bulkscore=100
adultscore=0 classifier=spam adjust=0 reason=mlx engine=6.0.2-1012030000
definitions=main-1105100173
Received: from sms1.mm.els204.clisys.tmcs ([10.75.20.63])
     by sms1-els204-94.mm.ticketmaster.com (StrongMail Enterprise 3.2.3(3.00.316)) ; Tue, 10 May 2011 17:21:11 -0700
X-VirtualServer: Default, sms1-els204-94.mm.ticketmaster.com, 10.75.20.62
X-VirtualServerGroup: Default
X-Destination-ID: XXXXXXXXX@mac.com
X-MailingID: 1232082537::1088744::DATABASEID::1169284::929109887::158307
X-SMHeaderMap: mid="X-MailingID"
X-SMFBL: aW5mb19maWVuZEBtYWMuY29t
X-Mailer: StrongMail Enterprise 3.2.3(3.00.316)
Content-type: multipart/alternative;
boundary="----=_NextPart_001_AEA6_74B0DC51.19495CFF"
MIME-version: 1.0
Message-id: <1232082537.158307@BOWERYBALLROOM.COM>
Subject:
=?UTF-8?B?U291bmRnYXJkZW4sIEJvbiBJdmVyLCBCZW4gSGFycGVyICYgbW9yZSBvbiBzYWxlIHRoaXMgd2Vlay4=?=
Date: Tue, 10 May 2011 17:21:11 -0700
To: XXXXXXXXX@mac.com
From: =?UTF-8?B?VGhlIEJvd2VyeSBCcmVzZW50cw==?= <INFO@BOWERYBALLROOM.COM>
```

Apple Phones and Apple Computers (communication unit) include a controller adapted for requesting data over a wireless communication channel from the MobileMe / iCloud host via the MobileMe / iCloud communications server.

See also What is IMAP and Why Do We Use It?, (http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html), accessed May 13, 2011, MOTO-APPLE-0006037953_126673:

Exhibit C   **PUBLIC REDACTED VERSION**

November 5, 2008

What Is IMAP and Why Do We Use It?

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.

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.

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.

See also MobileMe Features, (http://www.apple.com/mobileme/features/), accessed May 13, 2011, MOTO-APPLE-0006037953_127187:

Exhibit C   **PUBLIC REDACTED VERSION**

In addition, through its design of the Apple Phones and Apple Computers, Apple also induced users of the Accused Apple Products to infringe the '006 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 '006 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 Phones and Apple Computers. In addition, Apple instructs the users of the Apple Phones and Apple Computers 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. *See, e.g.* MobileMe Help,

Exhibit C   **PUBLIC REDACTED VERSION**

(http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204:

- To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ⊙ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done.

  When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images.

Moreover, Apple also contributes to the infringement of the '006 patent by users of the devices. As indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Apple Phones and Apple Computers would contribute to direct infringement of the '006 Patent. Apple knew that the Apple Phones and Apple Computers contain a specific software component for storing information on filtered data units in a summary store, 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 component was especially made, was both patented and infringing. Moreover, Apple Phones and Apple Computers users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Apple Phones and Apple Computers, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. *See, e.g.* MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204:

- To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ⊙ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done.
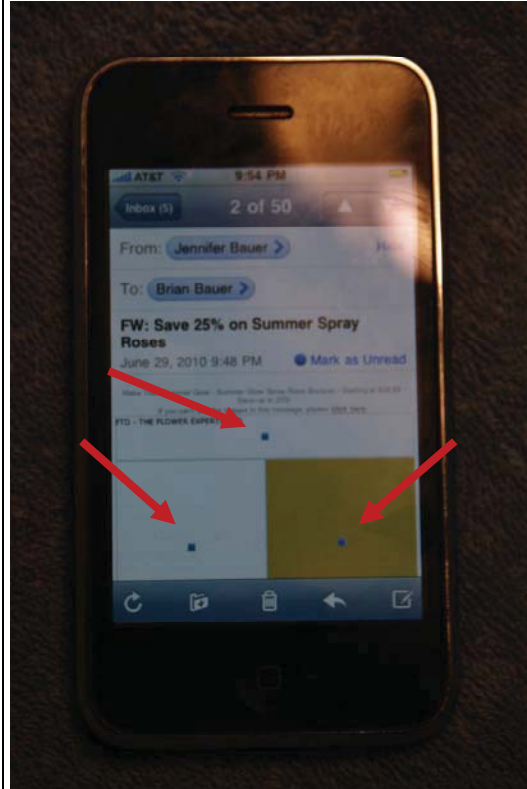
  When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images.
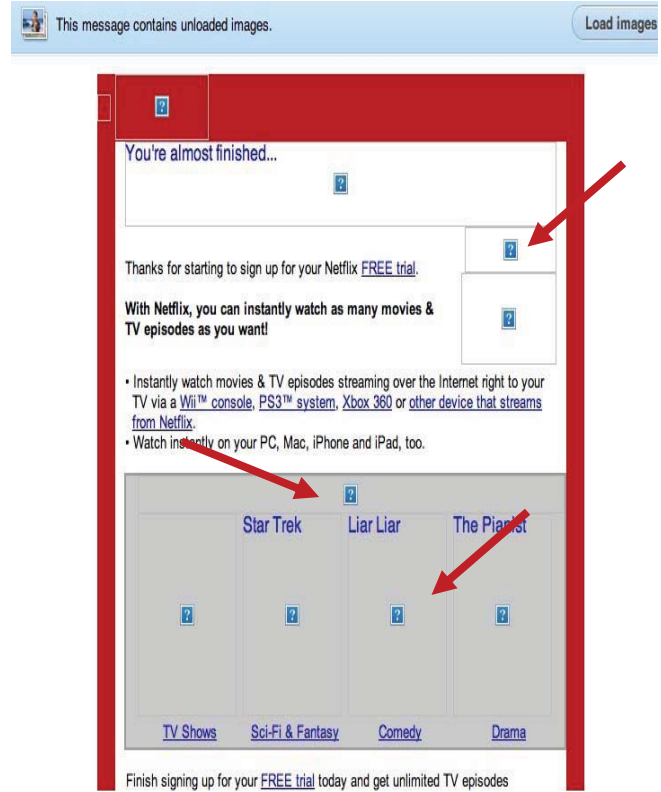
See also, iCloud – Calendar, Mail, and Contacts, http://www.apple.com/icloud/features/calendar-mail-contacts.html, accessed on October 27, 2011:

23

Exhibit C   **PUBLIC REDACTED VERSION**

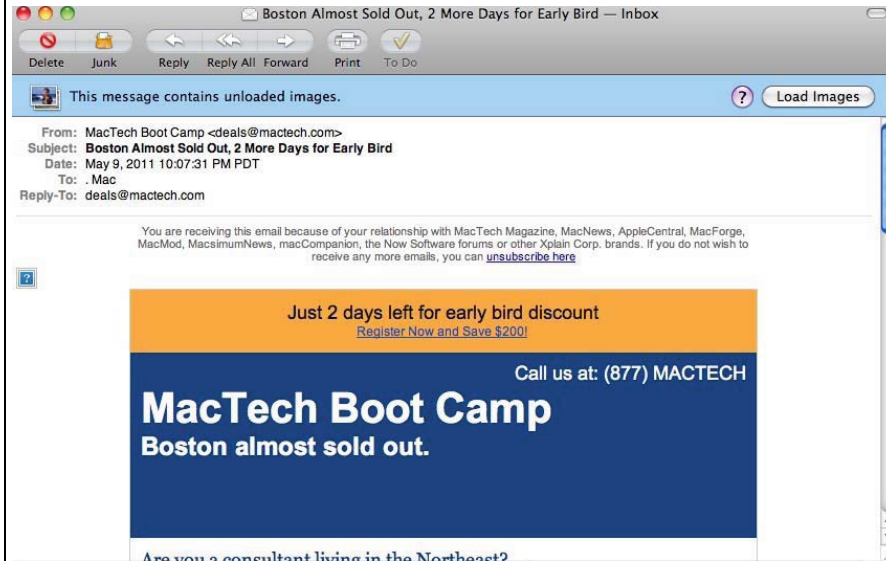|	
(a) a summary store to store identifying information received from the host via the communications server about data units not sent from the host to the communication unit and not received at the communication unit.	Upon information and belief, Apple Phones and/or Apple Computers contain a summary store that stores the date, subject, sender, etc. (the identifying information) received from host (*e.g.*, MobileMe's / iCloud's host server) via MobileMe's / iCloud's communication server about HTML images (the data units not sent from the host) to the Apple Phone and/or Apple Computer (the communication unit) and not received by the Apple Phone and/or Apple Computer . *See also* Picture of the iPhone showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Phone, taken May 12, 2011, MOTO-APPLE-0006037953_127179 (arrows added); Picture of an Apple Computer showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Computer via the Mail.App in OS X, taken May 12, 2011, MOTO-APPLE-0006037953_127180 (arrows added); Picture of an Apple Computer showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Computer via the MobileMe web application, taken May 12, 2011, MOTO-APPLE-0006037953_127181 (arrows added):

Exhibit C   **PUBLIC REDACTED VERSION**

Apple _____ Phone ____ Apple   Computer via Mail.App

Exhibit C   **PUBLIC REDACTED VERSION**
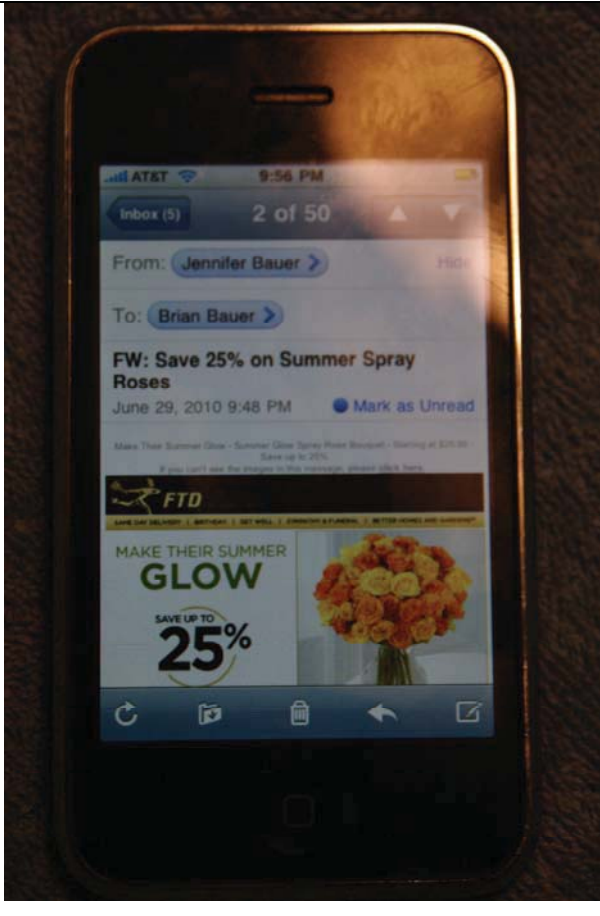
Apple Computer via MobileMe web application

See also Photo of iPhone showing HTML images after being downloaded from the MobileMe infrastructure, taken June 29, 2010, MOTO-APPLE-0006037953_127182:

Exhibit C   **PUBLIC REDACTED VERSION**

wherein said data units are individually filtered prior to reception at the communication unit, based upon user definable filter parameters.	Upon information and belief, said HTML images (data units) are individually filtered prior to reception at the Apple Phone and/or Apple Computer (the communication unit), based upon whether the end user has chosen to not receive HTML images (the user definable filter parameters). The user of an Apple Phone can select which mailboxes (and which folders within those mailboxes) are synched to the device. In addition, the user of an Apple Phone can select how many emails should be downloaded to the device, and the user of an Apple Phone can select not to load remote HTML images. MobileMe / iCloud receives any and all of these user-selected criteria previously prepared at the Apple Phone, which are, when completed, sent to the MobileMe / iCloud communication server.

27

Exhibit C   **PUBLIC REDACTED VERSION**

Upon information and belief, for an Apple Phone, this is performed when the "load remote images" setting is set to "off" in the Apple Phone Settings App:
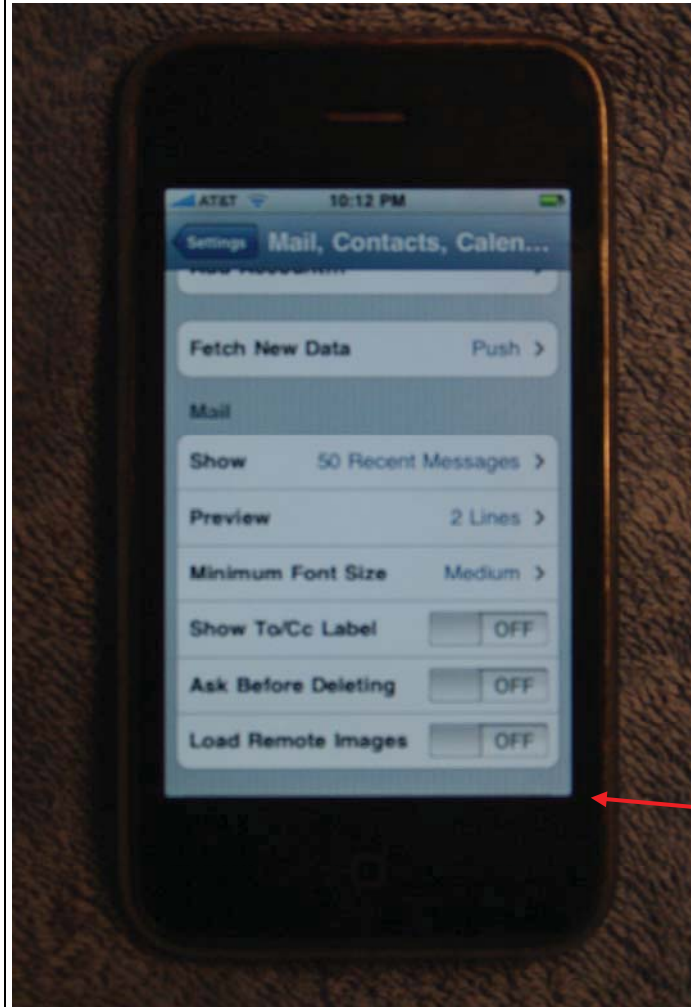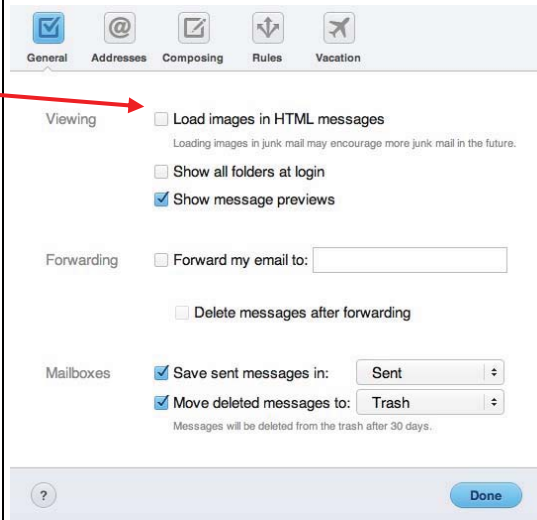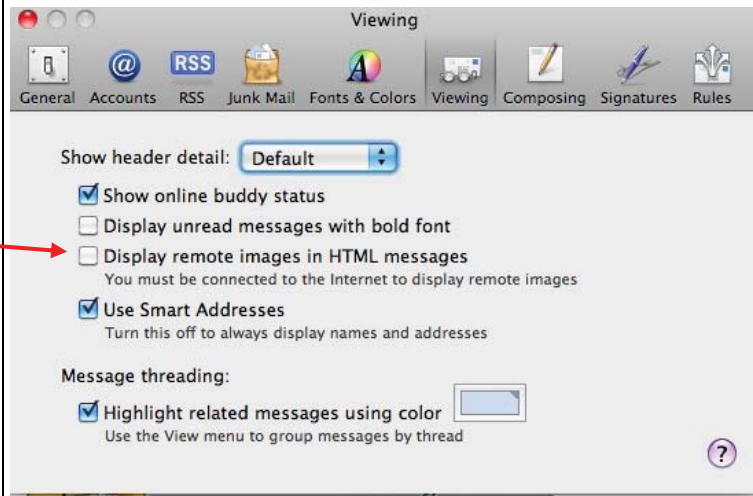

Photo of Apple iPhone showing option to load remote images, taken June 29, 2010, MOTO-APPLE-0006037953_127176 (arrow added).

28

Exhibit C   **PUBLIC REDACTED VERSION**

Upon information and belief, on an Apple computer, this is performed when (1) the "Display remote images in HTML messages" setting is not selected in the Mail.App of Apple's OS X operating system or (2) the "Load images in HTML messages" setting is not selected in the Preferences section of the MobileMe web application:
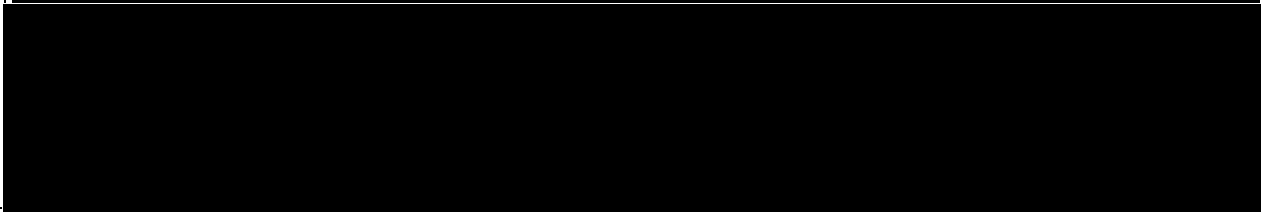
Exhibit C   **PUBLIC REDACTED VERSION**

See Screenshots of Apple Computer showing options to display images in HTML messages, taken May 12, 2011, MOTO-APPLE-0006037953_127177-78 (arrows added).

See also MobileMe Help,
(http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204:
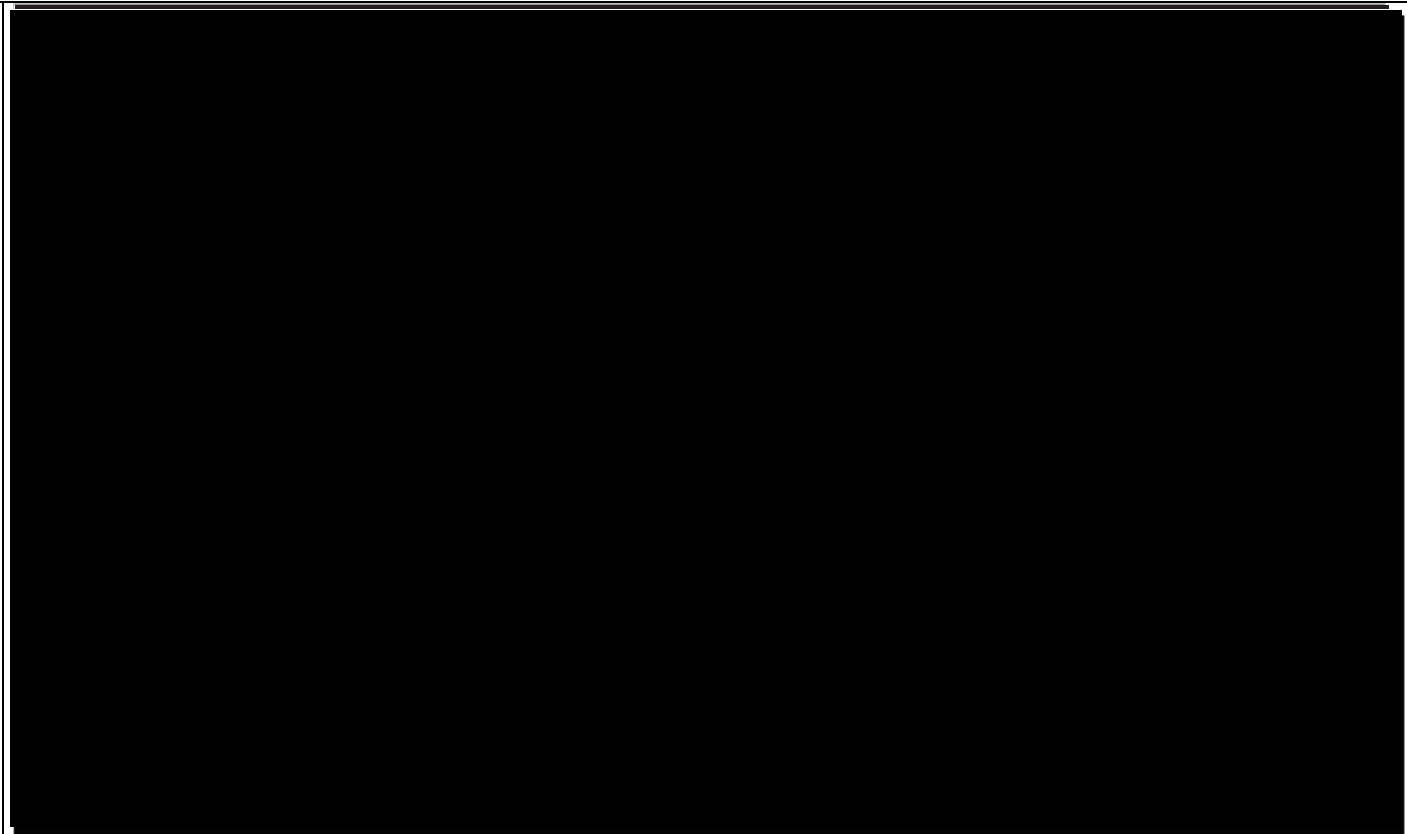
- To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ⬚ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done.

  When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images.

See also 745-Apple0783686-786 at -717:

Exhibit C   **PUBLIC REDACTED VERSION**

Exhibit C **PUBLIC REDACTED VERSION**

See also iCloud: How spam is filtered, http://support.apple.com/kb/HT4899, accessed October 27, 2011:

iCloud automatic spam filtering

To minimize spam for iCloud customers, iCloud Mail automatically detects spam before it reaches your Inbox. Spam prevention requires filtering mechanisms that include dynamic lists, trend analysis, and content filtering.