

UNITED STATES PATENT NO. 6,101,531

SUPPLEMENTAL INFRINGEMENT CONTENTIONS¹


Accused Apple Products:² 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, Apple Mac Pro, MobileMe, iCloud.

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer
1. A method of communicating data units over a wireless network between a client communication unit and a host device via a	Upon information and belief, Apple Phones and Apple Computers perform each and every step of this claim in the course of normal use with MobileMe / iCloud. Additionally, a user of an Apple Phone and/or Apple Computer 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.


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 Mobility 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 service 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, 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.

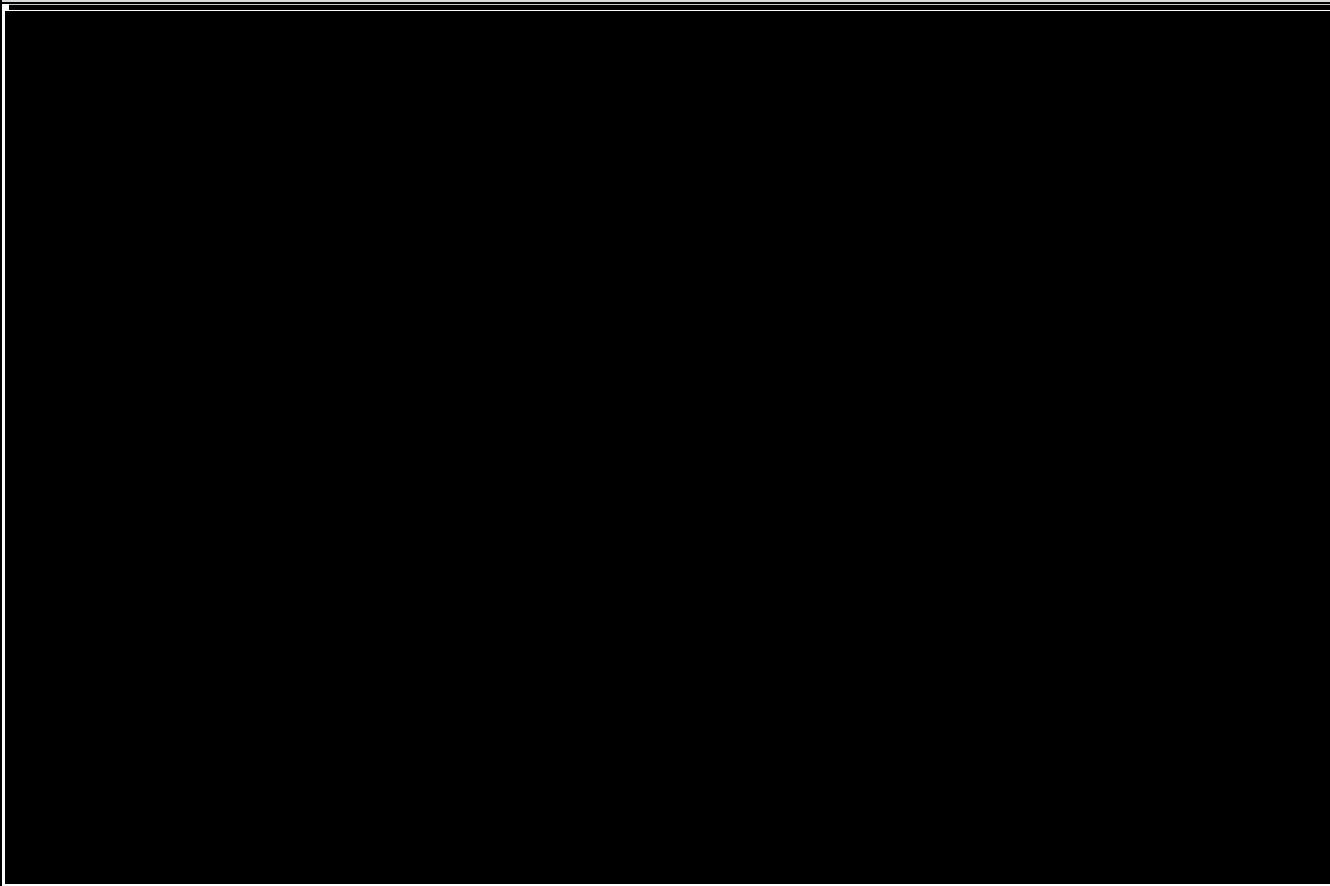
<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
<p>communication server, the method comprising, at the communication server:</p>	<p>Over a wireless network, Apple and/or its users communicate data units (e.g., email) between a client communication unit (an Apple Phone or an Apple Computer) and a host device (a MobileMe / iCloud mail server) via a communication server (a MobileMe / iCloud communication server):</p> <p>November 5, 2008 What Is IMAP and Why Do We Use It?</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>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 on May 5, 2011, MOTO-APPLE-0006037953_126657.</p> <p>See MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011,</p>

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	<p>MOTO-APPLE-0006037953_127187:</p> <h2>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>    <p><i>See also, iCloud – Calendar, Mail, and Contacts, http://www.apple.com/icloud/features/calendar-mail-contacts.html, accessed on October 27, 2011:</i></p>

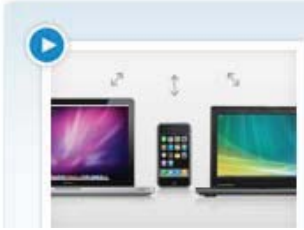
<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div data-bbox="667 326 926 444">  <p>Mail</p> </div> <div data-bbox="667 488 1050 516"> <p>Mail that delivers. Free.</p> </div> <div data-bbox="667 537 1774 643"> <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="590 748 1906 1179"> <p>In addition, through its design of the Apple Phones and Apple Computers, Apple also induced users of the Apple Phones and Apple Computers to infringe the '531 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 '531 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: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206.</p> </div> <div data-bbox="600 1227 1703 1308"> <ul style="list-style-type: none"> ▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details. </div> <div data-bbox="590 1360 1906 1429"> <p>Moreover, Apple also contributes to the infringement of the '531 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 Phones</p> </div>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>and Apple Computers would contribute to direct infringement of the '531 Patent. Apple knew that the Apple Phones and Apple Computers contain a specific software component for filtering data units, a component with no substantial non-infringing use, that could be combined with Apple's MobileMe / iCloud services, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Apple Phone and Apple Computer 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: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206.</p> <p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p>
<p>filtering data units based on a first set of user-selected criteria to produce filtered data units;</p>	<p>Upon information and belief, MobileMe / iCloud filters data units based on a first set of user-selected criteria to produce filtered data units. 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 MobileMe / iCloud communication server. For example, MobileMe filters email messages (data units) based on a user decision to automatically filter junk mail messages (user-selected criteria to produce filtered data units):</p> <p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p>

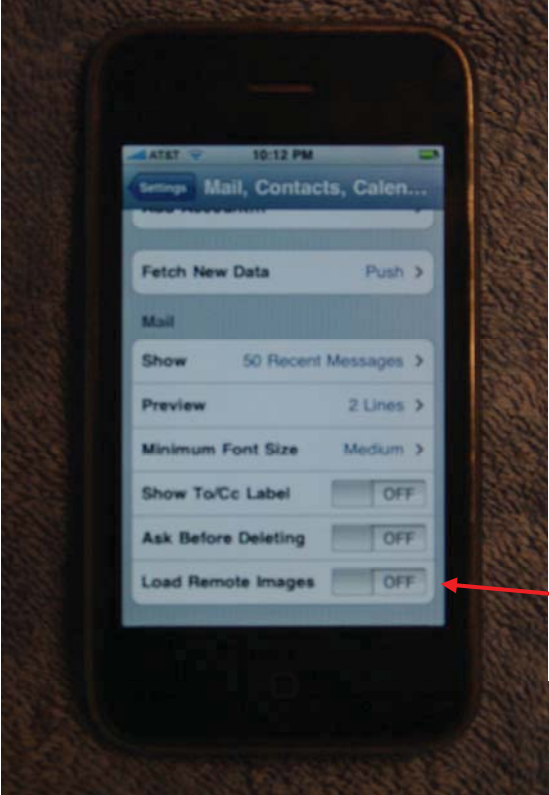
'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	<p>MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206.</p> <p><i>See also 745-Apple0783686-786 at -717:</i></p> 

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 <p data-bbox="583 1177 1906 1284"><i>See also</i> iCloud: How spam is filtered, http://support.apple.com/kb/HT4899, accessed October 27, 2011:</p>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>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.</p>
<p>communicating the filtered data units to the client communication unit;</p>	<p>Upon information and belief, MobileMe / iCloud communicates the filtered data units to the client communication unit. For example, MobileMe communicates e-mails that pass through the MobileMe junk mail filter (filtered data units) to an Apple Phone or Apple Computer (client communication unit)</p>




<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div data-bbox="625 345 1157 467"> <h2>Mail, Contacts, and Calendar</h2> </div> <div data-bbox="625 516 1199 760"> <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="632 829 1205 1057">  <p>Push email, push contacts, push calendar. Watch the QuickTour ▶</p> </div> <div data-bbox="1241 350 1871 1019">  </div> <div data-bbox="583 1092 1906 1162"> <p>MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p> </div> <div data-bbox="583 1203 1906 1312"> <p>See MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206:</p> </div>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p> <p>See also iCloud: How spam is filtered, http://support.apple.com/kb/HT4899, accessed October 27, 2011:</p> <p>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.</p>
<p>receiving a second set of a plurality of user-selected criteria, wherein the second set of the plurality of user-selected criteria has been previously prepared at the client communication unit and, when completed, has been sent to the communication server in a virtual session;</p>	<p>Upon information and belief, MobileMe / iCloud can receive a second set of a plurality of user-selected criteria, wherein the second set of the plurality of user-selected criteria has been previously prepared at the client communication unit and, when completed, has been sent to the communication server in a virtual session.</p> <p>The user of an Apple Phone can select which mailboxes (and which folders within those mailboxes) are synced 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 MobileMe / iCloud communication server. For example:</p>

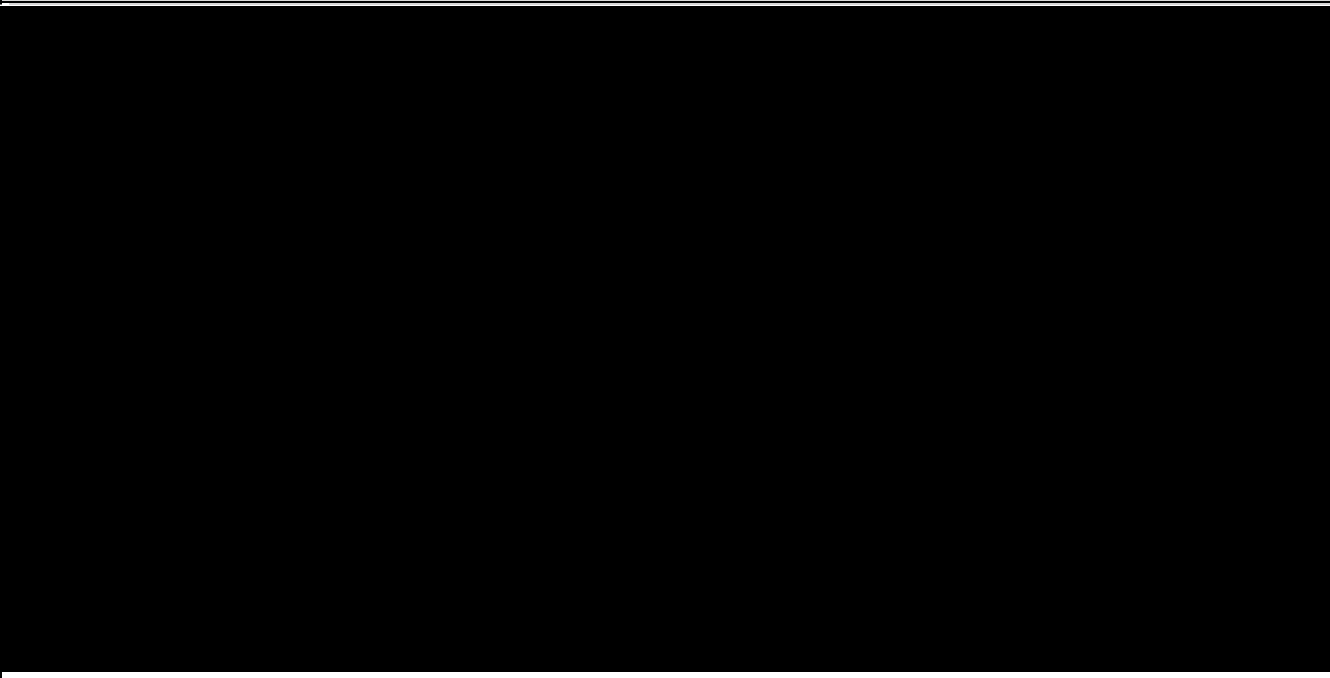
'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 <p data-bbox="590 1117 1871 1187">Photo of Apple iPhone showing option to load remote images, taken June 29, 2010, MOTO-APPLE 0006037953_127176 (arrow added).</p> <p data-bbox="590 1227 1885 1333">The user of a Apple Computer can identify junk mail that passed through the first set of user-selected filter criteria. MobileMe receives this new user-selected criteria previously prepared at the Apple Computer, which is, when completed, sent to the MobileMe communication server:</p>

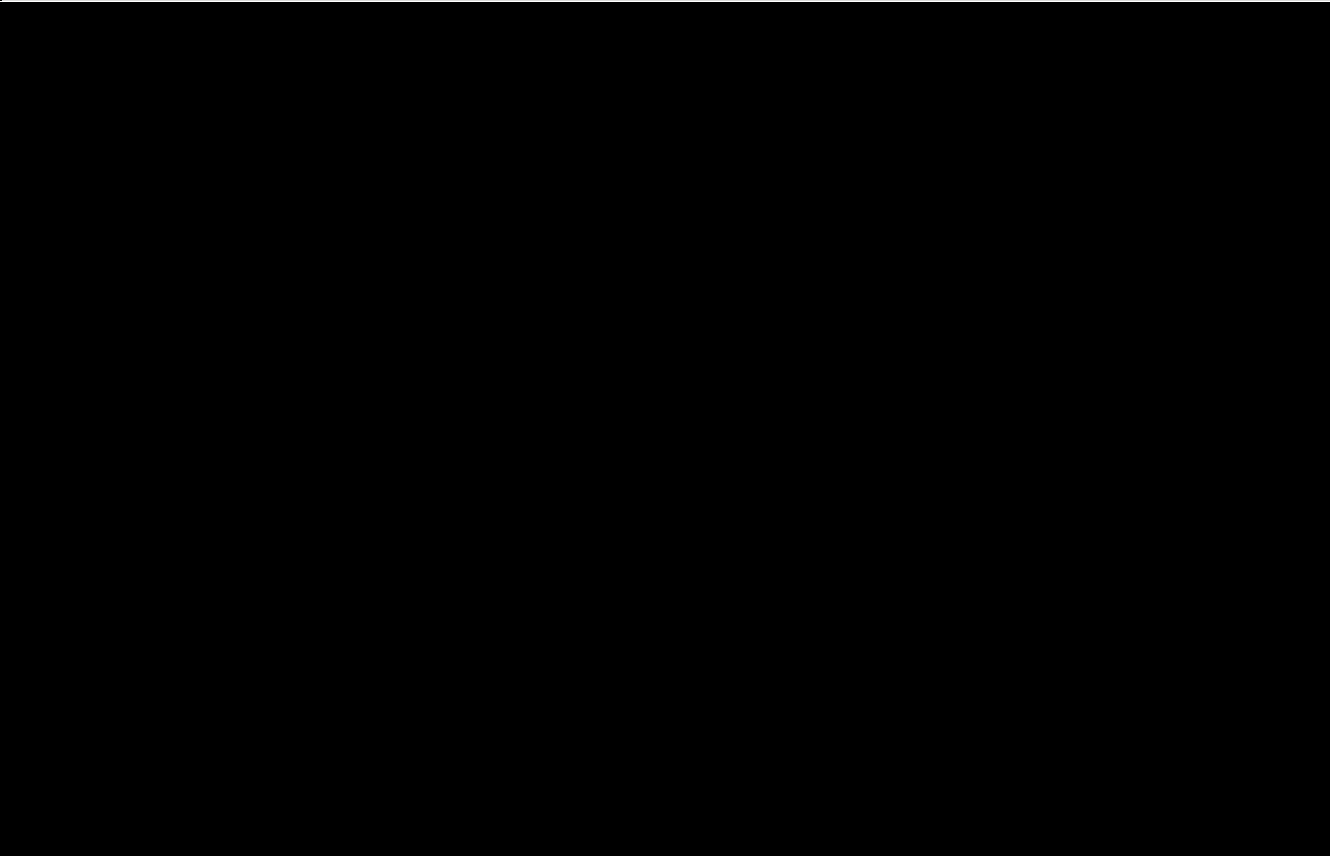
<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div data-bbox="617 326 667 375" data-label="Image"> </div> <p data-bbox="680 337 1073 370">Helping Mail identify junk mail</p> <p data-bbox="617 402 1661 451">Mail can analyze the content of incoming messages and identify which ones are likely to be junk mail. It highlights these messages in color (by default, in brown) in your Inbox.</p> <p data-bbox="617 492 1724 573">If you receive messages that have been highlighted as junk, or messages that are junk but weren't highlighted, you can mark the messages as not junk or junk yourself. When you mark messages, Mail updates the junk mail database accordingly. Over time, Mail will identify junk mail more accurately.</p> <div data-bbox="617 607 1671 922" data-label="Complex-Block" style="border: 1px solid gray; padding: 10px;"> <p data-bbox="638 630 919 654">To identify junk messages:</p> <ul style="list-style-type: none"> <li data-bbox="638 670 1640 751">■ To identify one or more messages in your Inbox as junk mail, select the messages and then click Junk in the toolbar, or choose Message > Mark > As Junk Mail. <li data-bbox="638 792 1650 873">■ To correct one or more messages that have been wrongly classified as junk, select the messages and click Not Junk in the toolbar, or choose Message > Mark > As Not Junk Mail. </div> <p data-bbox="590 976 1839 1081">Helping Mail identify junk mail, (http://docs.info.apple.com/article.html?path=Mail/3.0/en/9940.html), accessed on May 13, 2011, MOTO-APPLE-0006037953_126637.</p> <p data-bbox="590 1122 1881 1227"><i>See MobileMe: Why was I "spammed" at my MobileMe Mail address?</i>, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206:</p> <ul style="list-style-type: none"> <li data-bbox="600 1271 1703 1352">■ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.

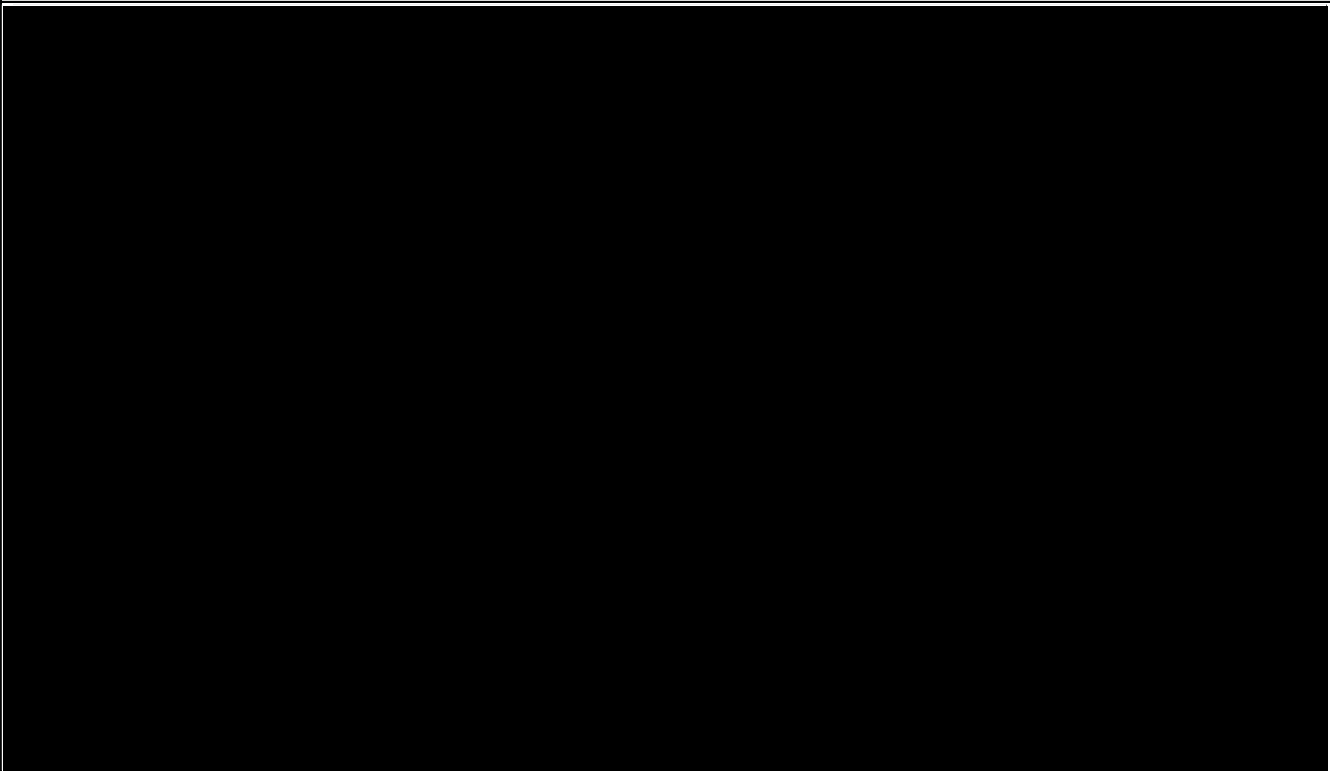
'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	<p><i>See also</i> How MobileMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207:</p> <p>Forward spam to spam@me.com</p> <p>Filtering spam at the server is only part of the equation. You may find it helpful to use your mail application filtering to complement the server filtering. To learn more about how to use filtering and other options for dealing with spam, see "Why was I 'spammed' at my MobileMe Mail address?".</p> <p><i>See also</i> MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-006037953_127187:</p>

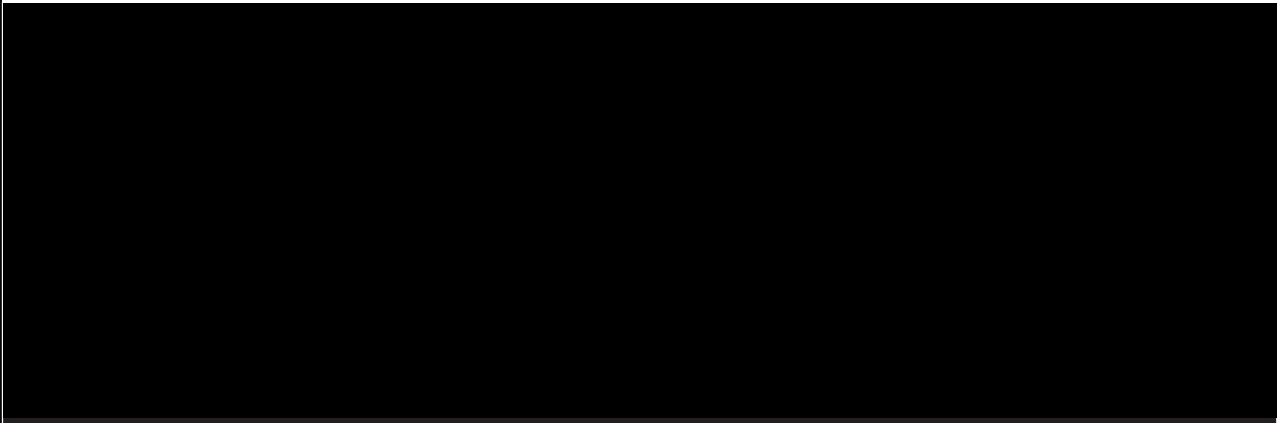
<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div style="text-align: center;"> <h2 style="margin: 0;">Mail, Contacts, and Calendar</h2> <p style="margin: 10px 0;">MobileMe keeps your mail, contacts, 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 style="margin-top: 20px;">  <p style="margin: 0;">Push email, push contacts, push calendar. Watch the QuickTour ▶</p> </div>
<p>filtering subsequent data units based on the second set of the plurality of user-selected criteria to create subsequent filtered data units; and</p>	<p>Upon information and belief, MobileMe / iCloud will filter subsequent email messages (data units) based on the second set of the plurality of user-selected criteria to create subsequent filtered data units.</p> <p>When used with an Apple Phone, MobileMe / iCloud will filter later email messages (subsequent data units) based on the Apple Phone user's criteria of which folders / mailboxes to sync, how many emails should be downloaded for display, and whether to download remote HTML images to create subsequent filtered emails.</p> <p>When used with an Apple Computer, MobileMe / iCloud will filter subsequent email messages</p>




<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>(subsequent data units) based on the new junk mail criteria (the second set of the plurality of user-selected criteria) to create subsequent filtered emails</p> <p>Helping Mail identify junk mail, (http://docs.info.apple.com/article.html?path=Mail/3.0/en/9940.html), accessed on May 13, 2011, MOTO-APPLE-0006037953_126637.</p> <p>See MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206:</p> <ul style="list-style-type: none"> ▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details. <p>See also How MobileMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207:</p> <p>Forward spam to spam@me.com</p> <p>Filtering spam at the server is only part of the equation. You may find it helpful to use your mail application filtering to complement the server filtering. To learn more about how to use filtering and other options for dealing with spam, see "Why was I 'spammed' at my MobileMe Mail address?".</p> <p>See also 745-Apple0783686-786 at -717:</p> <div style="background-color: black; height: 100px; width: 100%;"></div>

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 A large black rectangular redaction covers the entire content area of the table, obscuring all text and data that would otherwise be present in the body cells.


'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 <p data-bbox="583 1149 1906 1195"><i>See also 745-Apple4699474 at -488-489:</i></p>

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p><i>See also 745-Apple4857865-99 at -84</i></p> 
<p>communicating the subsequent filtered data units to the client communication unit.</p>	<p>Upon information and belief, MobileMe / iCloud communicates the subsequent filtered data units to the client communication unit. For example, MobileMe / iCloud will allow messages that pass through the Apple Phone user's criteria of which folders / mailboxes to sync, how many emails should be downloaded for display, and whether to download remote HTML images to create (the subsequent filtered data units) to the Apple Phone (client communication unit)</p> <p>Likewise, MobileMe / iCloud will allow messages that pass through the new junk mail filter(the subsequent filtered data units) to the Apple Computer (client communication unit).</p>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div style="text-align: center;"> <h2 style="margin: 0;">Mail, Contacts, and Calendar</h2> <p style="margin: 10px 0;">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 style="margin-top: 20px;">  <p style="margin: 5px 0;">Push email, push contacts, push calendar. Watch the QuickTour ▶</p> </div> <p style="margin-top: 20px;">MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p>
<p>2. The method according to claim 1 further comprising truncating a subsequent filtered data unit if the subsequent filtered data unit exceeds a first filter size.</p>	<p>Upon information and belief, Apple Phones perform each and every step of this claim in the course of normal use with MobileMe / iCloud. Additionally, a user of an Apple Phone 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 and has actively induced users to perform such steps, and has contributed to such use by selling Apple Phones and MobileMe / iCloud and by providing directions for their use.</p>

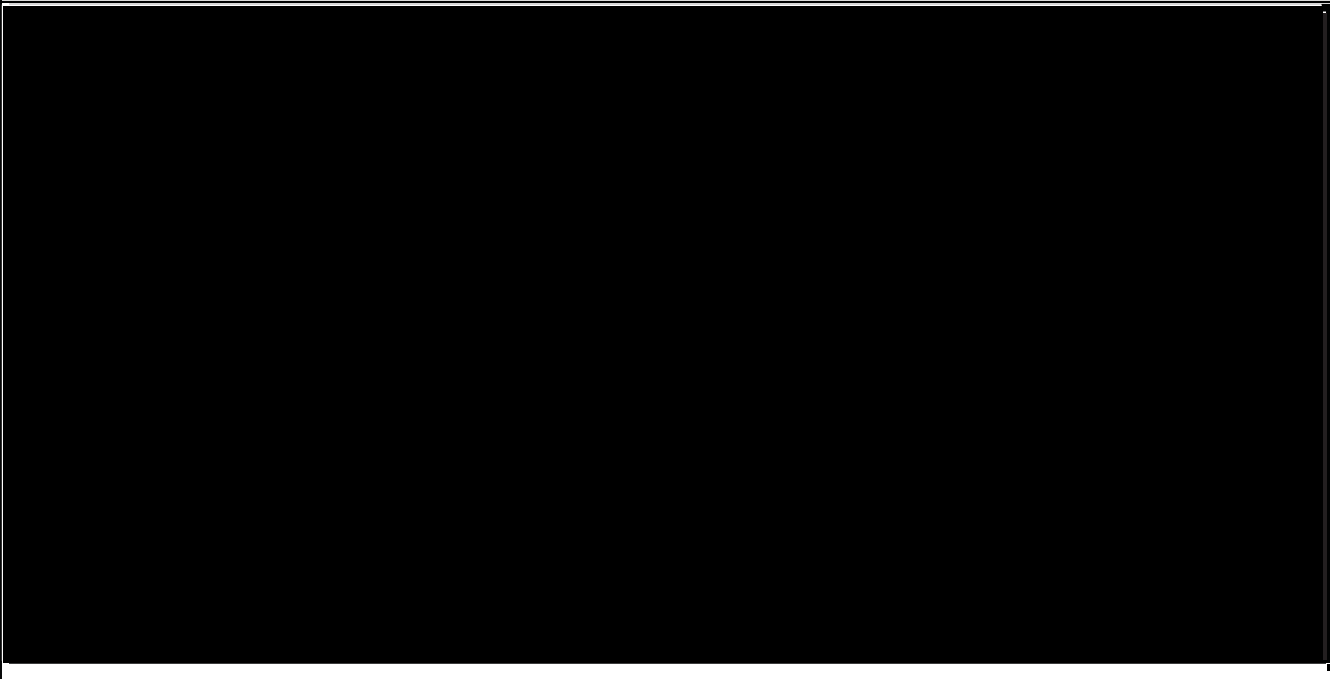
<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>Upon information and belief, Apple Phones will truncate subsequent data units if the subsequent filtered data unit exceeds a second filter size.</p>
<p>11. A method of communicating data units over a wireless network between a client communication unit and a host device via a communication server, the method comprising:</p>	<p>Upon information and belief, Apple Phones and Apple Computers perform each and every step of this claim in the course of normal use with MobileMe / iCloud. Additionally, a user of an Apple Phone and/or Apple Computer 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. Over a wireless network, Apple and/or its users communicate data units (<i>e.g.</i>, email) between a client communication unit (an Apple Phone or an Apple Computer) and a host device (a MobileMe / iCloud mail server) via a communication server (a MobileMe / iCloud communication server):</p>

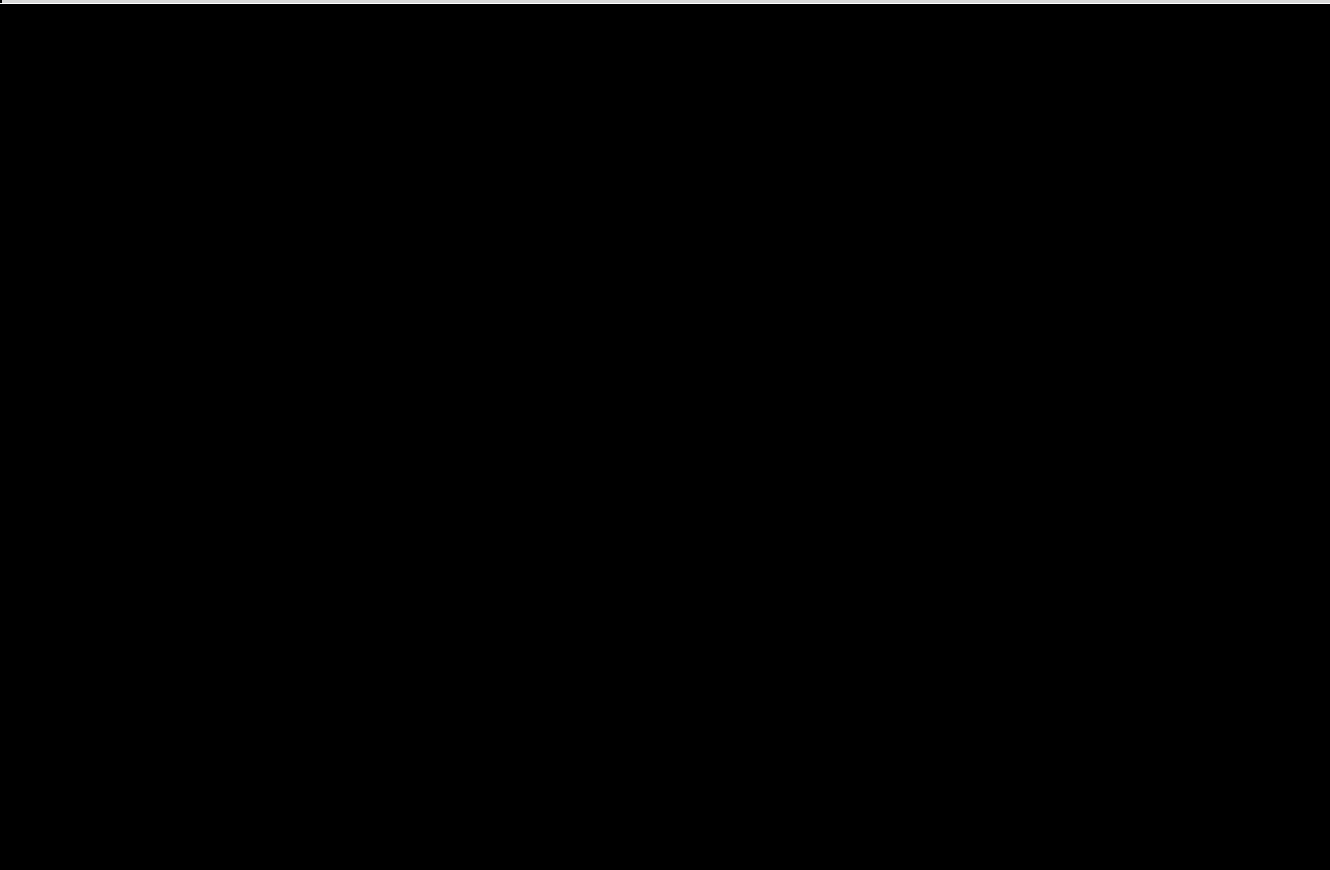
<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>November 5, 2008 What Is IMAP and Why Do We Use It?</p> <p>There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words 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>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 on May 5, 2011, MOTO-APPLE-0006037953_126657.</p> <p>See MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:</p>



<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div data-bbox="625 345 1155 470"> <h2>Mail, Contacts, and Calendar</h2> </div> <div data-bbox="625 516 1197 760"> <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="630 828 1207 1055">  </div> <div data-bbox="1239 349 1869 1023">  </div> <div data-bbox="583 1096 1906 1421"> <p>In addition, through its design of the Apple Phones and Apple Computers, Apple also induced users of the Apple Phones and Apple Computers to infringe the '531 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 '531 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</p> </div>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>manuals. <i>See, e.g.</i> MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206.</p> <p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p> <p>Moreover, Apple also contributes to the infringement of the '531 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 '531 Patent. Apple knew that the Apple Phones and Apple Computers contain a specific software component for filtering data units, a component with no substantial non-infringing use, that could be combined with Apple's MobileMe service, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Apple Phone and Apple Computer 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. <i>See, e.g.</i> MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206.</p> <p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p>
<p>filtering data units, at the communication server, based on a first set of user-selected</p>	<p>Upon information and belief, MobileMe / iCloud filters data units based on a first set of user-selected criteria to produce filtered data units. 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</p>

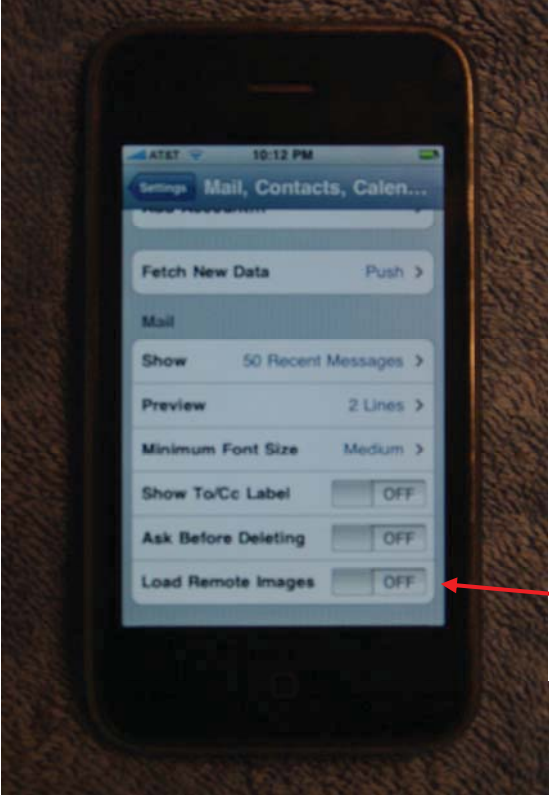
‘531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
<p>criteria to produce filtered data units;</p>	<p>Phone can select how many emails should be downloaded to the device, and the user of an Apple Phone can select not to load remote HTML images. MobileMe receives any and all of these user-selected criteria previously prepared at the Apple Phone, which are, when completed, sent to MobileMe communication server. For example, MobileMe / iCloud filters email messages (data units) based on a user decision to automatically filter junk mail messages (user-selected criteria to produce filtered data units).</p> <p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p> <p>MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206.</p> <p>See also 745-Apple0783686-786 at -717:</p> <div style="background-color: black; height: 100px; width: 100%;"></div>


'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 A large black rectangular redaction covers the entire content area of the table, obscuring all text and data that would otherwise be present in the 'Representative Apple Products' column.

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	



<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
<p>communicating, at the communication server, the filtered data units to the client communication unit;</p>	<p>Upon information and belief, MobileMe / iCloud communicates the filtered data units to the client communication unit. For example, MobileMe / iCloud communicates e-mails that pass through the MobileMe / iCloud junk mail filter (filtered data units) to an Apple Phone or Apple Computer (client communication unit).</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 1047 1205 1274" style="border: 1px solid #ccc; padding: 5px; background-color: #f0f8ff;">  </div> <div data-bbox="1241 570 1871 1239" style="text-align: center;">  </div> </div> <p>MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p>


<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>See MobileMe: Why was I "spammed" at my MobileMe Mail address?, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206:</p> <ul style="list-style-type: none"> ▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.
<p>preparing, at the client communication unit, a second set of a plurality of user-selected criteria, and when completed, communicating the second set of the plurality of user-selected criteria to the communication server in a virtual session;</p>	<p>The user of an Apple Phone can prepare a second set of a plurality of filter criteria, <i>e.g.</i>, a user can select which mailboxes (and which folders within those mailboxes) are synced 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.</p> <p>When the user has completed preparing the second set of a plurality of filter criteria, it is communicated to MobileMe / iCloud communication server in a virtual session.</p>

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 <p data-bbox="590 1117 1871 1187">Photo of Apple iPhone showing option to load remote images, taken June 29, 2010, MOTO-APPLE 0006037953_127176 (arrow added).</p> <p data-bbox="590 1227 1885 1333">The user of a Apple Computer can identify junk mail that passed through the first set of user-selected filter criteria. MobileMe receives this new user-selected criteria previously prepared at the Apple Computer, which is, when completed, sent to the MobileMe communication server:</p>


<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div data-bbox="619 324 1081 373">  <p>Helping Mail identify junk mail</p> </div> <p data-bbox="619 397 1669 454">Mail can analyze the content of incoming messages and identify which ones are likely to be junk mail. It highlights these messages in color (by default, in brown) in your Inbox.</p> <p data-bbox="619 487 1732 576">If you receive messages that have been highlighted as junk, or messages that are junk but weren't highlighted, you can mark the messages as not junk or junk yourself. When you mark messages, Mail updates the junk mail database accordingly. Over time, Mail will identify junk mail more accurately.</p> <div data-bbox="619 609 1669 917" style="border: 1px solid gray; padding: 10px;"> <p>To identify junk messages:</p> <ul style="list-style-type: none"> ■ To identify one or more messages in your Inbox as junk mail, select the messages and then click Junk in the toolbar, or choose Message > Mark > As Junk Mail. ■ To correct one or more messages that have been wrongly classified as junk, select the messages and click Not Junk in the toolbar, or choose Message > Mark > As Not Junk Mail. </div> <p data-bbox="588 974 1837 1079">Helping Mail identify junk mail, (http://docs.info.apple.com/article.html?path=Mail/3.0/en/9940.html), accessed on May 13, 2011, MOTO-APPLE-0006037953_126637.</p> <p data-bbox="588 1120 1879 1226"><i>See MobileMe: Why was I "spammed" at my MobileMe Mail address?</i>, (http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206:</p> <ul style="list-style-type: none"> ■ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.

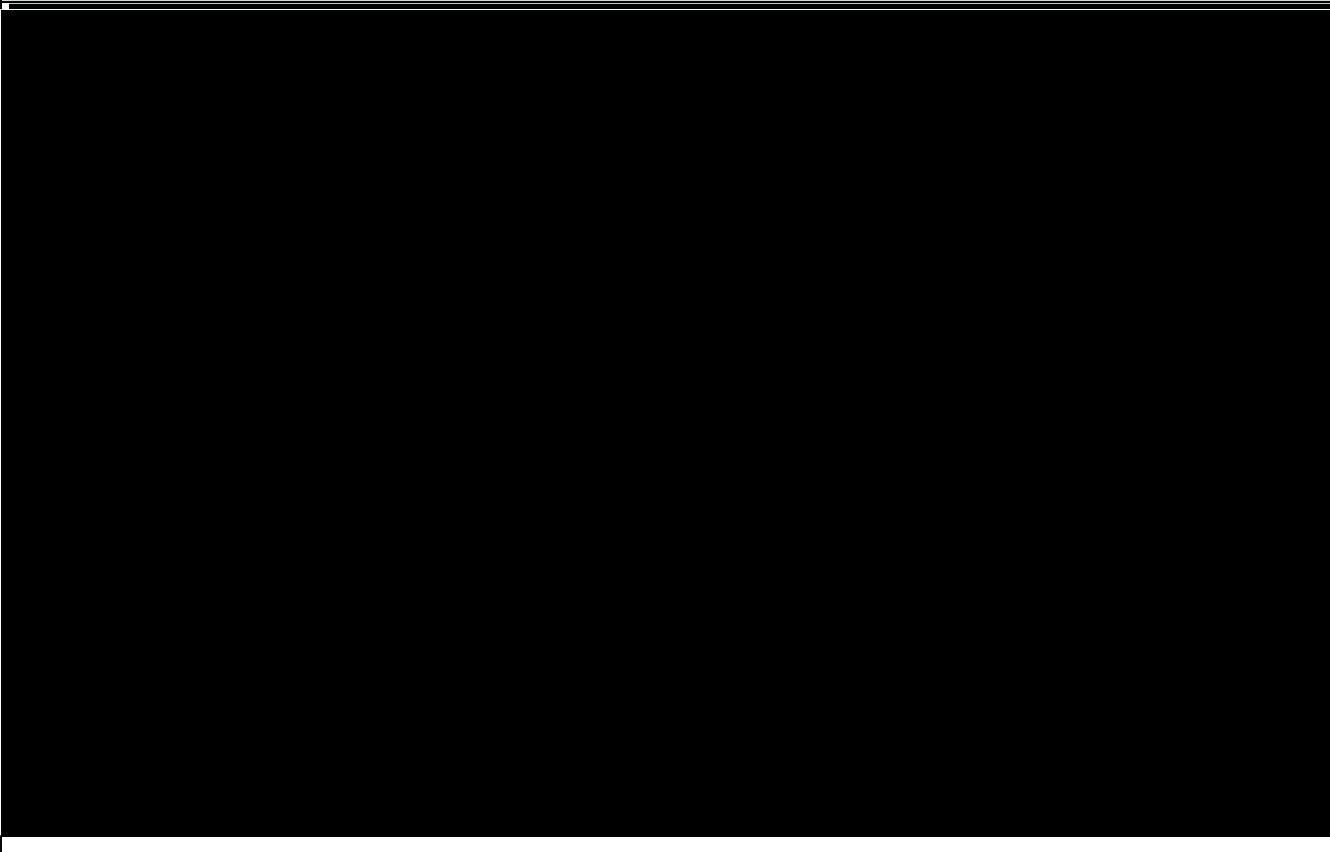
'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	<p><i>See also</i> How MobileMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207:</p> <p>Forward spam to spam@me.com</p> <p>Filtering spam at the server is only part of the equation. You may find it helpful to use your mail application filtering to complement the server filtering. To learn more about how to use filtering and other options for dealing with spam, see "Why was I 'spammed' at my MobileMe Mail address?".</p> <p><i>See also</i> MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-006037953_127187:</p>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<div style="text-align: center;"> <h2 style="margin: 0;">Mail, Contacts, and Calendar</h2> <p style="margin: 10px 0;">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 style="margin-top: 20px;">  </div>
<p>filtering subsequent data units, at the communication server, based on the second set of the plurality of user-selected criteria to create subsequent filtered data units; and</p>	<p>Upon information and belief, MobileMe / iCloud will filter subsequent email messages (data units) based on the second set of the plurality of user-selected criteria to create subsequent filtered data units.</p> <p>When used with an Apple Phone, MobileMe / iCloud will filter later email messages (subsequent data units) based on the Apple Phone user's criteria of which folders / mailboxes to sync, how many emails should be downloaded for display, and whether to download remote HTML images to create subsequent filtered emails.</p> <p>When used with an Apple Computer, MobileMe / iCloud will filter subsequent email messages</p>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>(subsequent data units) based on the new junk mail criteria (the second set of the plurality of user-selected criteria) to create subsequent filtered emails.</p> <div data-bbox="709 435 1759 1036" style="border: 1px solid #ccc; padding: 10px;">  <p>Helping Mail identify junk mail</p> <p>Mail can analyze the content of incoming messages and identify which ones are likely to be junk mail. It highlights these messages in color (by default, in brown) in your Inbox.</p> <p>If you receive messages that have been highlighted as junk, or messages that are junk but weren't highlighted, you can mark the messages as not junk or junk yourself. When you mark messages, Mail updates the junk mail database accordingly. Over time, Mail will identify junk mail more accurately.</p> <p>To identify junk messages:</p> <ul style="list-style-type: none"> ■ To identify one or more messages in your Inbox as junk mail, select the messages and then click Junk in the toolbar, or choose Message > Mark > As Junk Mail. ■ To correct one or more messages that have been wrongly classified as junk, select the messages and click Not Junk in the toolbar, or choose Message > Mark > As Not Junk Mail. </div> <p>Helping Mail identify junk mail, http://docs.info.apple.com/article.html?path=Mail/3.0/en/9940.html), accessed on May 13, 2011, MOTO-APPLE-0006037953_126637.</p> <p>See MobileMe: Why was I "spammed" at my MobileMe Mail address?, http://support.apple.com/kb/HT2073?viewlocale=en_US), accessed May 13, 2011, MOTO-APPLE-0006037953_127206:</p>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p> <ul style="list-style-type: none"> <p>▪ Rules You can set up rules in Mail at me.com to help filter out certain emails from your Inbox that you deem as spam. See MobileMe Mail Help for more details.</p> <p>See also How MobileMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207:</p> <p>Forward spam to spam@me.com</p> <p>Filtering spam at the server is only part of the equation. You may find it helpful to use your mail application filtering to complement the server filtering. To learn more about how to use filtering and other options for dealing with spam, see "Why was I 'spammed' at my MobileMe Mail address?".</p> <p>See also 745-Apple0783686-786 at -717:</p> <div style="background-color: black; height: 100px; width: 100%;"></div> </p>

'531 Patent Claim	Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³
	 A large black rectangular redaction covers the entire content area of the table, obscuring all text and data.

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	
<p>communicating, at the communication server, the subsequent filtered data units to the client communication unit.</p>	<p>Upon information and belief, MobileMe / iCloud communicates the subsequent filtered data units to the client communication unit. For example, MobileMe / iCloud will allow messages that pass through the Apple Phone user's criteria of which folders / mailboxes to sync, how many emails should be downloaded for display, and whether to download remote HTML images to create (the subsequent filtered data units) to the Apple Phone (client communication unit)</p> <p>Likewise, MobileMe / iCloud will allow messages that pass through the new junk mail filter(the</p>

<p>'531 Patent Claim</p>	<p>Representative Apple Products: Apple MobileMe / iCloud communicating with an Apple Phone and / or Apple Computer³</p>
	<p>subsequent filtered data units) to the Apple Computer (client communication unit).</p> <p>Mail, Contacts, and Calendar</p> <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 data-bbox="632 865 1205 1089">  <p>Push email, push contacts, push calendar. Watch the QuickTour ▶</p> </div> <div data-bbox="1241 386 1871 1057">  </div> <p>MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p>