

UNITED STATES PATENT NO. 6,377,161

SUPPLEMENTAL INFRINGEMENT CONTENTIONS¹


Accused Apple Products:² Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S ("Apple iPhones"), Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, Apple iPod Touch ("Apple iPads and iPods"), Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro ("Apple Computers"), MobileMe, and iCloud.


'161 Patent Claim	Accused Apple Products³
1. A method in a wireless messaging system for facilitating an exchange of address information between	Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of their normal use. Additionally, a user of the Accused Apple Products performs each and every step of this claim in the course of such use. In a wireless messaging system, the Accused Apple Products facilitate the exchange of address


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 This list of Accused Apple Products was created based on publicly available information. Motorola reserves the right to supplement this list of Accused Apple Products.

³ This chart provides Motorola's infringement analysis for the Accused Apple Products. In this claim chart, "Apple iPhone" 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 iPhone" 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.


'161 Patent Claim	Accused Apple Products ³		
<p>first and second portable messaging units, the method comprising the steps of:</p>	<p>information between first and second portable messaging units. For example,</p> <p>(1) Using a wireless messaging system (<i>e.g.</i>, MobileMe, iCloud, Exchange, Gmail, Yahoo, AOL, SMS, cellular telephone network, etc.), Apple iPhones, Apple iPads and iPods, and Apple Computers can facilitate an exchange of email address information (address information) between, <i>e.g.</i>, an Apple iPhone (first portable messaging unit) and, <i>e.g.</i>, another Apple iPhone (second portable messaging unit).</p> <hr/> <div style="display: flex; align-items: center;">  <p>iPhone works with MobileMe, Microsoft Exchange, and many of the most popular email systems—including Yahoo!, Google, and AOL—as well as most industry-standard POP3 and IMAP email systems. View PDFs and other attachments within Mail. Save attached photos and graphics to your Camera Roll album. See Chapter 6, “Mail,” on page 74.</p> </div> <hr/> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688.</p> <p><i>See also id.</i> at MOTO-APPLE-0006037953_126751:</p> <hr/> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top; padding-right: 20px;"> <p>Add an email recipient to your contacts list</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”</p> </td> </tr> </table> <hr/> <p><i>See also</i>, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:</p>	<p>Add an email recipient to your contacts list</p>	<p>Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”</p>
<p>Add an email recipient to your contacts list</p>	<p>Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”</p>		

'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="562 472 919 505">Amazing by all accounts.</p> <p data-bbox="562 516 1087 792">Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> <div data-bbox="1182 269 1724 976" style="text-align: center;">  </div> <p data-bbox="520 1078 1881 1182">(2) In addition, over a cellular telephone network (wireless messaging system, Apple iPhones facilitate the exchange of text message address information (address information) between, <i>e.g.</i>, an Apple iPhone (first portable messaging unit) and, <i>e.g.</i>, another Apple iPhone (second portable messaging unit)):</p>


'161 Patent Claim	Accused Apple Products ³
	<p style="text-align: center;">Sending and Receiving Messages</p> <div style="border: 1px solid blue; padding: 5px; margin-bottom: 10px;"> <p>WARNING: For important information about driving safely, see the <i>Important Product Information Guide</i> at www.apple.com/support/manuals/iphone.</p> </div> <p>Messages lets you exchange text messages with anyone using an SMS-capable phone or other device. Messages also supports MMS, so you can send photos, video clips, contact information, and voice memos to other MMS-capable devices. You can enter multiple addressees to send one message to several people.</p> <p>Note: SMS or MMS support may not be available in all countries or regions. Additional fees may apply for use of Messages. Contact your carrier for more information.</p> <p>The Messages icon on the Home screen shows the number of unread messages you have.</p> <div style="text-align: center; margin-bottom: 10px;">  Number of unread messages </div> <p>You can use Messages whenever you're in range of the cellular network. If you can make a call, you can send a message. Depending on your phone plan, you may be charged for the messages you send or receive.</p> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126780.</p> <p>In addition, Apple has performed each and every step of this claim and through its design of the Accused Apple Products, Apple also induced users of the Accused Apple Products to infringe the '161 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 '161 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></p>

'161 Patent Claim	Accused Apple Products ³		
	<p data-bbox="520 267 1743 300"><i>e.g.</i>, iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688:</p> <hr/> <div data-bbox="554 358 638 444">  </div> <p data-bbox="554 453 615 480">Mail</p> <p data-bbox="724 358 1793 501">iPhone works with MobileMe, Microsoft Exchange, and many of the most popular email systems—including Yahoo!, Google, and AOL—as well as most industry-standard POP3 and IMAP email systems. View PDFs and other attachments within Mail. Save attached photos and graphics to your Camera Roll album. See Chapter 6, “Mail,” on page 74.</p> <hr/> <p data-bbox="520 560 1089 592"><i>Id.</i> at MOTO-APPLE-0006037953_126751:</p> <hr/> <table border="0" data-bbox="537 654 1766 797"> <tr> <td data-bbox="537 654 1094 686">Add an email recipient to your contacts list</td> <td data-bbox="1178 654 1766 797">Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”</td> </tr> </table> <hr/> <p data-bbox="520 860 1803 927">http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:</p>	Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”
Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”		

'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="562 472 926 505" data-label="Section-Header"> <p>Amazing by all accounts.</p> </div> <div data-bbox="562 516 1094 792" data-label="Text"> <p>Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> </div> <div data-bbox="1184 269 1730 976" data-label="Image"> <p>The image shows an iPad displaying the 'Settings' application. The 'Mail, Contacts, Calendars' section is selected, leading to the 'Add Account...' screen. This screen lists several email providers: Microsoft Exchange, mobileme, Gmail, YAHOO!, AOL, and Other. The iPad is shown in a light gray color with a white bezel.</p> </div> <div data-bbox="516 1040 1871 1401" data-label="Text"> <p>Apple also knew that offering to sell or selling the Accused Apple Products would contribute to direct infringement of the '161 Patent. 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 '161 Patent. Apple knew that the Accused Apple Products contain a specific software component for facilitating the exchange of address information, a component with no substantial non-infringing use, which 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, users of the Accused Apple Products have, in fact, combined these components into an infringing method. 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>, MOTO-</p> </div>


'161 Patent Claim	Accused Apple Products ³
	APPLE-0006037953_126688, MOTO-APPLE-0006037953_126751, and MOTO-APPLE-0006037953_126647, above.
<p>sending the address information from the first portable messaging unit to the second portable messaging unit through the wireless messaging system;</p>	<p>Upon information and belief, Apple iPhones, Apple iPads and iPods, and Apple Computers send the address information to another portable messaging unit through the wireless messaging system. For example,</p> <p>(1) Through a wireless messaging system, a first Accused Apple Product (first portable messaging unit) can send email address information (address information) to, <i>e.g.</i>, a second Accused Apple Product (second portable messaging unit) :</p> <hr/> <div data-bbox="554 654 638 737">  </div> <div data-bbox="554 745 615 776"> <p>Mail</p> </div> <div data-bbox="722 649 1793 795"> <p>iPhone works with MobileMe, Microsoft Exchange, and many of the most popular email systems—including Yahoo!, Google, and AOL—as well as most industry-standard POP3 and IMAP email systems. View PDFs and other attachments within Mail. Save attached photos and graphics to your Camera Roll album. See Chapter 6, “Mail,” on page 74.</p> </div> <hr/> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688.</p> <p>See also, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:</p>

'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="562 472 926 505">Amazing by all accounts.</p> <p data-bbox="562 516 1094 792">Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> <div data-bbox="1184 269 1730 976" style="text-align: center;">  </div> <p data-bbox="516 1040 1856 1149">(2) In addition, through a cellular telephone network, a first Apple iPhone (first portable messaging unit) can send text address information (address information) to, <i>e.g.</i>, a second Apple iPhone (second portable messaging unit) .</p>

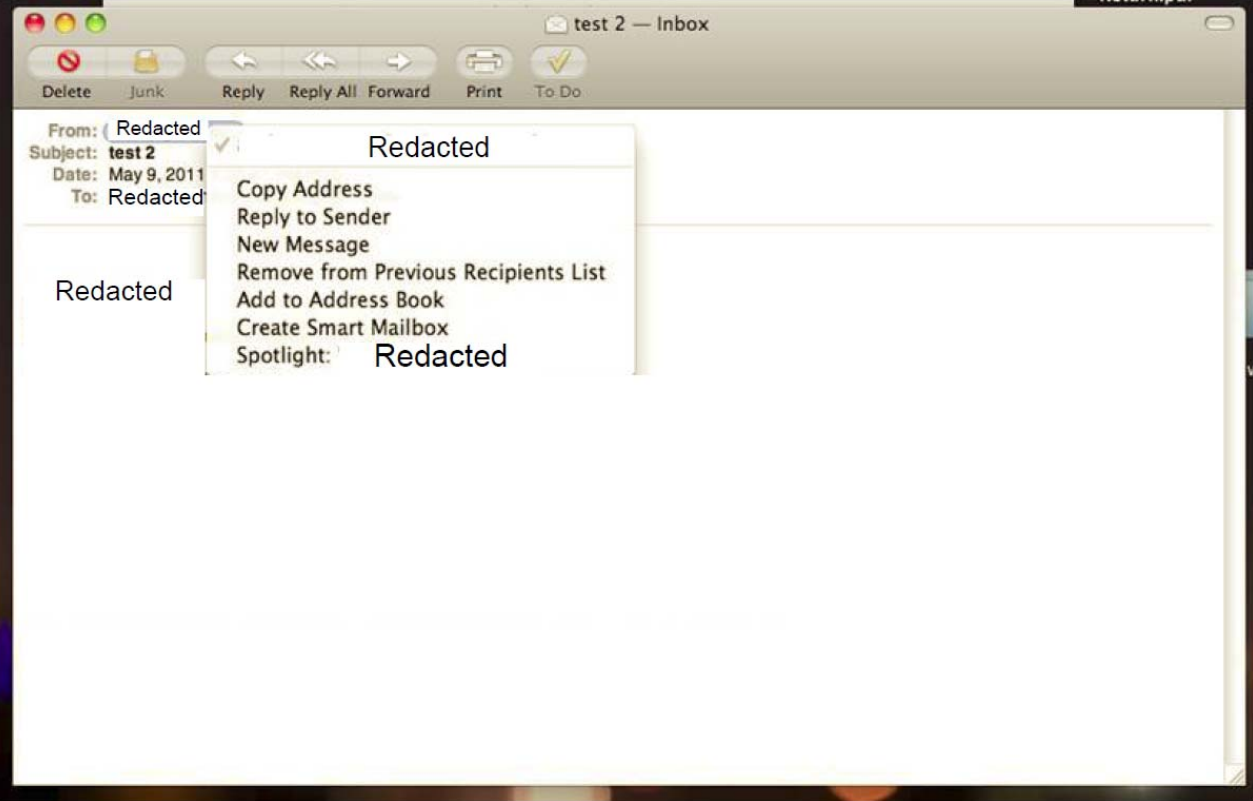
'161 Patent Claim	Accused Apple Products ³
	<p style="text-align: center;">Sending and Receiving Messages</p> <div style="border: 1px solid blue; padding: 5px; margin-bottom: 10px;"> <p>WARNING: For important information about driving safely, see the <i>Important Product Information Guide</i> at www.apple.com/support/manuals/iphone.</p> </div> <p>Messages lets you exchange text messages with anyone using an SMS-capable phone or other device. Messages also supports MMS, so you can send photos, video clips, contact information, and voice memos to other MMS-capable devices. You can enter multiple addressees to send one message to several people.</p> <p>Note: SMS or MMS support may not be available in all countries or regions. Additional fees may apply for use of Messages. Contact your carrier for more information.</p> <p>The Messages icon on the Home screen shows the number of unread messages you have.</p> <div style="text-align: center;">  Number of unread messages </div> <p>You can use Messages whenever you're in range of the cellular network. If you can make a call, you can send a message. Depending on your phone plan, you may be charged for the messages you send or receive.</p> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.</p>
<p>receiving the address information by the second portable messaging unit;</p>	<p>Upon information and belief, the email or text address information is received by the second Accused Apple Product. For example,</p> <p>(1) a second Accused Apple Product (second portable messaging unit) can receive email address information (address information) transmitted by a first Accused Apple Product (first portable messaging unit):</p>


'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="554 289 638 412" data-label="Image"> <p>The image shows the Mail application icon from an Apple device, which consists of a white envelope with a blue shadow, set against a blue square background with rounded corners.</p> </div> <div data-bbox="554 380 617 412" data-label="Text"> <p>Mail</p> </div> <div data-bbox="722 289 1793 428" data-label="Text"> <p>iPhone works with MobileMe, Microsoft Exchange, and many of the most popular email systems—including Yahoo!, Google, and AOL—as well as most industry-standard POP3 and IMAP email systems. View PDFs and other attachments within Mail. Save attached photos and graphics to your Camera Roll album. See Chapter 6, “Mail,” on page 74.</p> </div> <div data-bbox="512 487 1675 519" data-label="Text"> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688.</p> </div> <div data-bbox="512 558 1818 630" data-label="Text"> <p>See also, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:</p> </div>

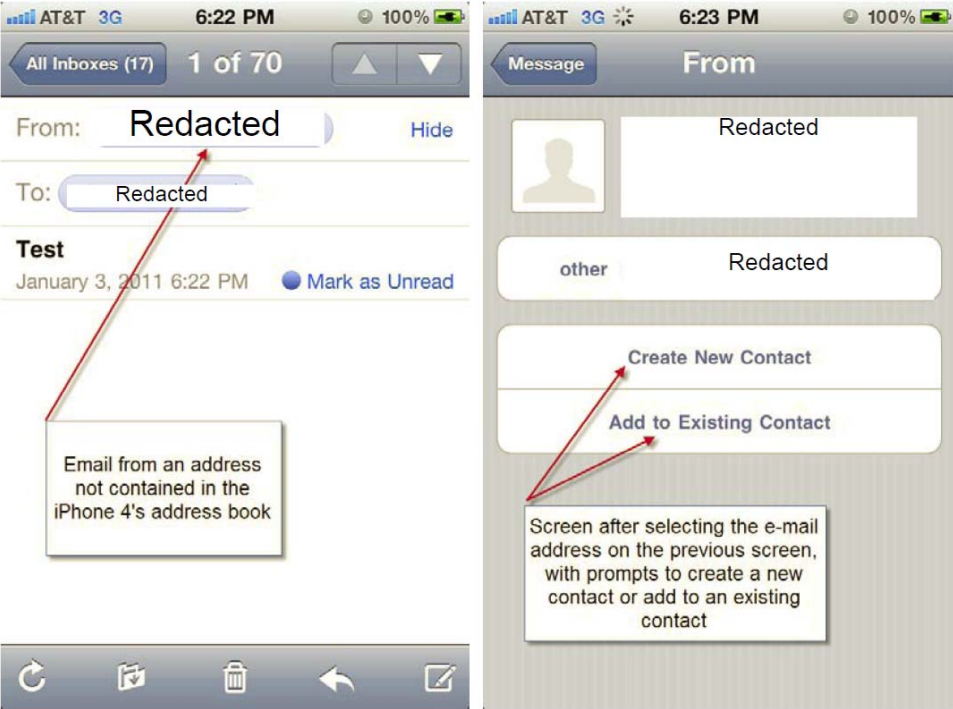
'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="562 475 919 505">Amazing by all accounts.</p> <p data-bbox="562 521 1087 792">Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> <div data-bbox="1182 269 1728 976" style="text-align: center;">  </div> <p data-bbox="520 1081 1808 1149">(2) Also, a second Apple iPhone (second portable messaging unit) can receive text message address information (address information) transmitted by a first Apple iPhone (first portable messaging unit):</p>

'161 Patent Claim	Accused Apple Products ³
	<p style="text-align: center;">Sending and Receiving Messages</p> <div style="border: 1px solid blue; padding: 5px; margin-bottom: 10px;"> <p>WARNING: For important information about driving safely, see the <i>Important Product Information Guide</i> at www.apple.com/support/manuals/iphone.</p> </div> <p>Messages lets you exchange text messages with anyone using an SMS-capable phone or other device. Messages also supports MMS, so you can send photos, video clips, contact information, and voice memos to other MMS-capable devices. You can enter multiple addressees to send one message to several people.</p> <p>Note: SMS or MMS support may not be available in all countries or regions. Additional fees may apply for use of Messages. Contact your carrier for more information.</p> <p>The Messages icon on the Home screen shows the number of unread messages you have.</p> <div style="text-align: center;">  Number of unread messages </div> <p>You can use Messages whenever you're in range of the cellular network. If you can make a call, you can send a message. Depending on your phone plan, you may be charged for the messages you send or receive.</p> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.</p>
<p>checking, by the second portable messaging unit in response to the receiving step, whether information identical to the address information is stored in an address book of the second portable messaging</p>	<p>Upon information and belief, the second Accused Apple Product checks, in response to the receiving step, whether information identical to the email or text address information is stored in its address book. For example,</p> <p>(1) Where the second portable messaging unit is an Apple iPhone, iPad, or iPod Touch, after receiving an email's address information (address information), the user of the second portable messaging unit can check to determine whether information identical to the email address information is stored in the Contacts App (the address book) of that Apple iPhone, iPad, or iPod Touch. If not, the Apple iPhone, iPad, or iPod Touch creates a prompt screen upon user selection of the email address, which allows the user to select the</p>

'161 Patent Claim	Accused Apple Products ³
<p>unit; and</p>	<p>email address and either create a new contact or add it to an existing contact:</p> <hr/> <p>Add an email recipient to your contacts list Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or "Add to Existing Contact."</p> <hr/> <p><i>Id.</i> at MOTO-APPLE-0006037953_126751.</p> <p>-----</p> <p>2) Where the second portable messaging unit is an Apple Computer, after receiving an email's address information (address information), the user of the second portable messaging unit can check to determine whether information identical to the email address information is stored in the Address Book Application (the address book) of that Apple Computer. If not, the Apple Computer creates a drop-down list upon user selection of the email address, from which the user can create a new contact or add it to an existing contact:</p>

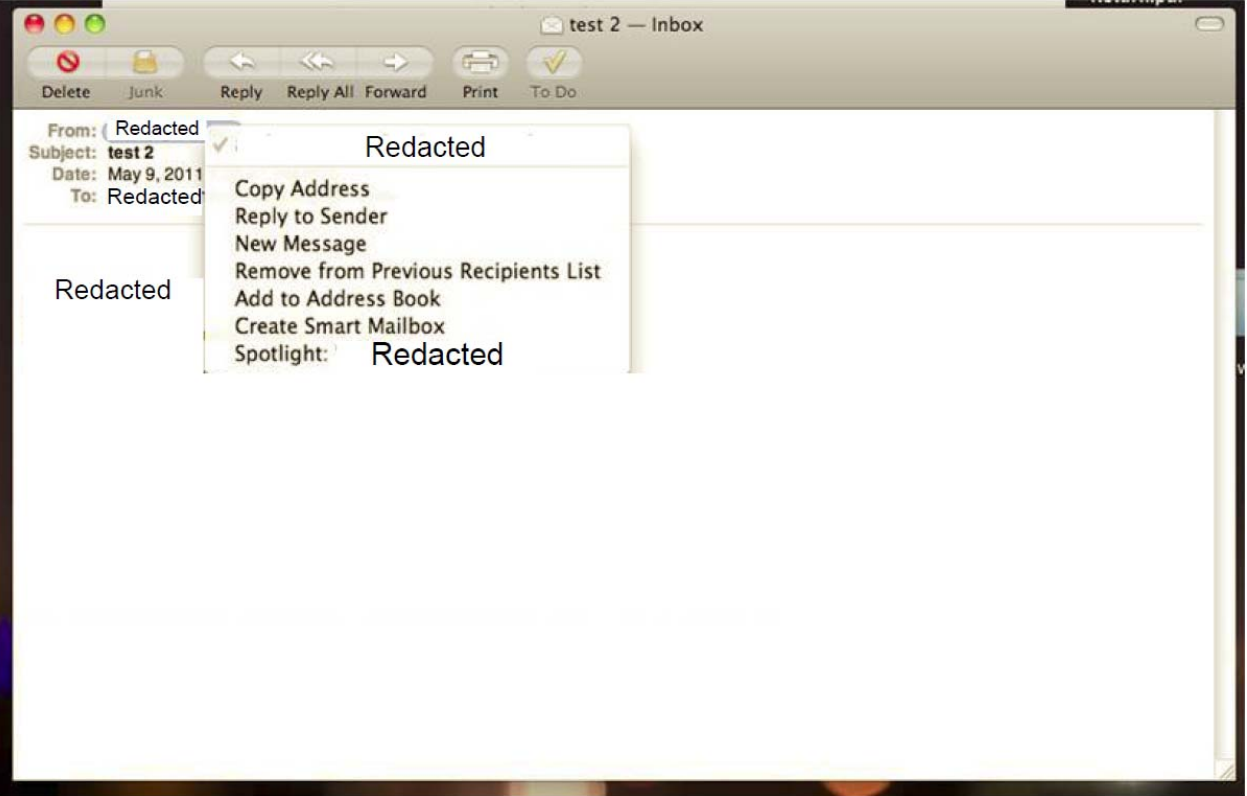
'161 Patent Claim	Accused Apple Products ³
	 <p>The screenshot shows a window titled "test 2 — Inbox" with a toolbar containing "Delete", "Junk", "Reply", "Reply All", "Forward", "Print", and "To Do". The email header shows "From: (Redacted)", "Subject: test 2", "Date: May 9, 2011", and "To: Redacted". A context menu is open over the recipient name "Redacted", listing options: "Copy Address", "Reply to Sender", "New Message", "Remove from Previous Recipients List", "Add to Address Book", "Create Smart Mailbox", and "Spotlight: Redacted".</p> <p>Screenshot of Apple Computer Screen, taken May 9, 2011, MOTO-APPLE-0006037953_126641.</p> <p>(2) Where a text message containing address information (address information) is received by a second Apple iPhone (second messaging unit), the user of the second portable messaging unit can check to determine whether information identical to the email address information is stored in the Contacts App (the address book) of that Apple iPhone. If not, the Apple iPhone creates a prompt screen upon user selection of the email address, which allows the user to select the email address and either create a new contact or add it to an existing contact:</p>


'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="705 683 947 878">iPhone 4's screen showing received text message without contact information entered for number</p> <p data-bbox="1381 574 1598 695">iPhone 4's screen after selecting "Create New" and adding name</p> <p data-bbox="520 1149 1885 1219">See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).</p>

'161 Patent Claim	Accused Apple Products ³
<p>processing the address information, by the second portable messaging unit, in a predetermined manner selected in response to the checking step.</p>	<p>Upon information and belief, as the second portable messaging unit, all Accused Apple Products process the address information in a predetermined manner selected in response to whether information identical to the second address information is stored in the address book. For example,</p> <p>(1) Where the second portable messaging unit is an Apple iPhone, iPad, or iPod Touch (second portable messaging unit) that device checks to determine whether information identical to the email address information is stored in the Contacts App (the address book) of the second portable messaging unit. If not, the second portable messaging unit creates a prompt screen upon user selection of the email address, which allows the user to either create a new contact or add it to an existing contact:</p> <p style="text-align: center;"><u>Where email address information is not in the Second iPhone's Contacts</u></p>  <p style="text-align: center;">Email from an address not contained in the iPhone 4's address book</p> <p style="text-align: center;">Screen after selecting the e-mail address on the previous screen, with prompts to create a new contact or add to an existing contact</p>

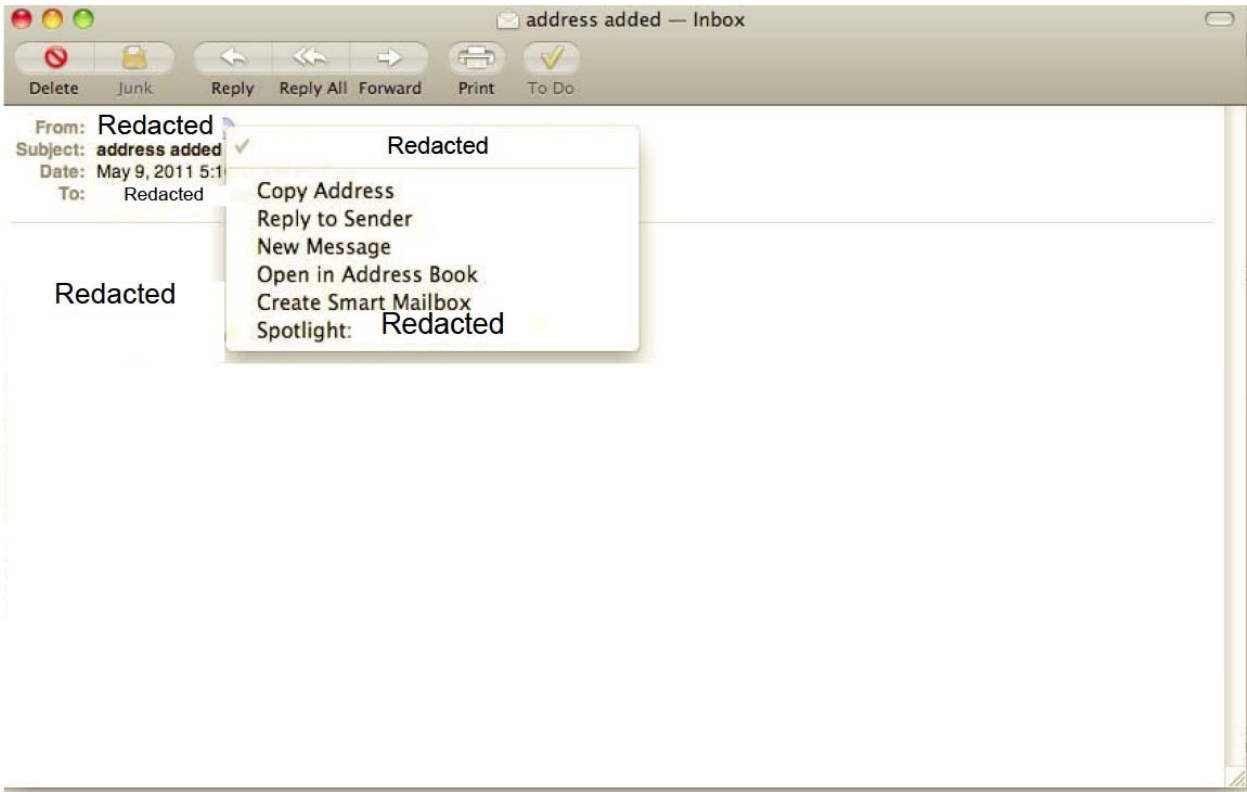
'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="947 331 1451 1094" data-label="Image"> <p>The image is a screenshot of an iPhone's 'New Contact' screen. At the top, the status bar shows 'AT&T 3G', '6:23 PM', and '100%' battery. The screen has a title bar with 'Cancel' and 'Done' buttons. Below the title bar, there is an 'add photo' button. The main content area contains several input fields: a name field with 'Redacted', a second name field with 'Redacted', a 'Company' field, a 'mobile Phone' field, an 'other' field with 'Redacted', a 'home Email' field, a 'ringtone Default' dropdown menu, and a 'home page URL' field. A white callout box on the left contains the text 'Screen after selecting "Create New Contact"'. Two red arrows originate from this callout box: one points to the first 'Redacted' name field, and the other points to the 'other' field.</p> </div> <p data-bbox="512 1133 1843 1198">See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126645-46 (arrows and labels added).</p> <p data-bbox="512 1242 1780 1274">See also iPhone User Guide for iOS 4.2 and 4.3 Software at MOTO-APPLE-0006037953_126751:</p>

'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="533 289 1092 321" data-label="Section-Header"> <p>Add an email recipient to your contacts list</p> </div> <div data-bbox="1171 289 1764 435" data-label="Text"> <p>Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or "Add to Existing Contact."</p> </div> <hr data-bbox="525 446 1801 449"/> <hr data-bbox="525 495 1885 498"/> <div data-bbox="520 542 1879 717" data-label="Text"> <p>Where the second portable messaging unit is an Apple Computer, that device checks to determine whether information identical to the email address information is stored in the Address Book Application (the address book) of the second portable messaging unit. If not, the Apple Computer creates a drop-down list upon user selection of the email address, from which the user can create a new contact or add it to an existing contact:</p> </div>

'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="516 1101 1654 1133">Apple Computer Screenshots, taken May 9, 2011, MOTO-APPLE-0006037953_126641.</p> <p data-bbox="516 1174 1881 1352">(2) Also, when a text message containing address information (address information) is received by a second Apple iPhone (second messaging unit), that device checks to determine whether information identical to the text address information is stored in the address book of the second Apple iPhone. If not, the second Apple iPhone creates a prompt button upon user selection of the text message, which allows the user to select the email address and either create a new contact or add it to an existing contact:</p>

'161 Patent Claim	Accused Apple Products ³
	<p style="text-align: center;"><u>Where text address information is not in the Second iPhone's Contacts</u></p>  <p>See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).</p> <hr style="border-top: 1px dashed black;"/>


'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="516 266 1812 334">If identical information is stored in the address book, the contact's name is displayed at the top of the screen and a "Contact Info" prompt is added:</p> <div data-bbox="688 386 1717 1154" style="text-align: center;"> </div> <p data-bbox="516 1192 1892 1260"><i>See</i> iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126644 (arrows and labels added).</p> <p data-bbox="516 1300 1850 1406"><i>See also</i> Additional Photo of Apple Computer Screen where address information is already in the Apple Computer's address book and no option to "Add to Address Book" is available, taken May 9, 2011, MOTO-APPLE-0006037953_126642:</p>

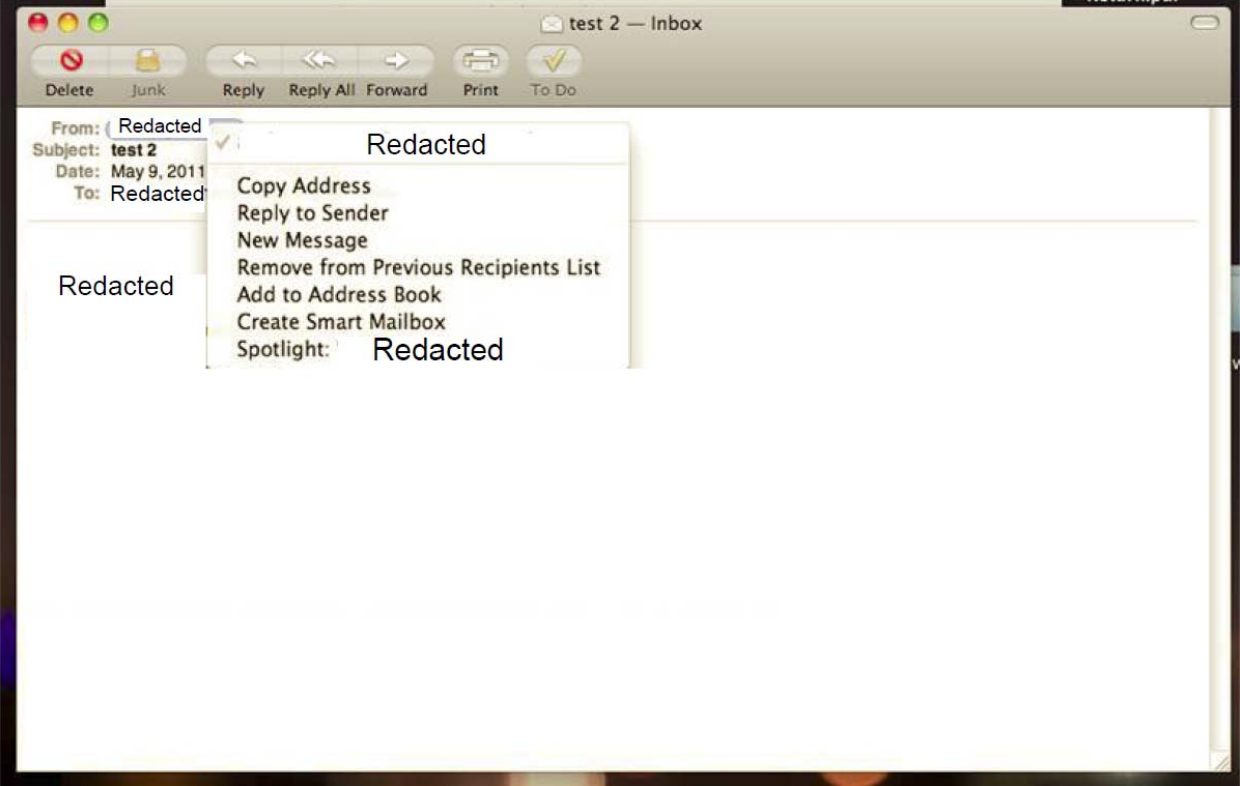
'161 Patent Claim	Accused Apple Products ³
	
<p>2. The method of claim 1, wherein the processing step comprises the step of storing the address information in the</p>	<p>Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of their normal use. Additionally, a user of the Accused Apple Products 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 Apple Products and providing directions for their use. The Accused Apple Products perform the method of Claim 1, wherein the processing step comprises the step of storing the address information in</p>

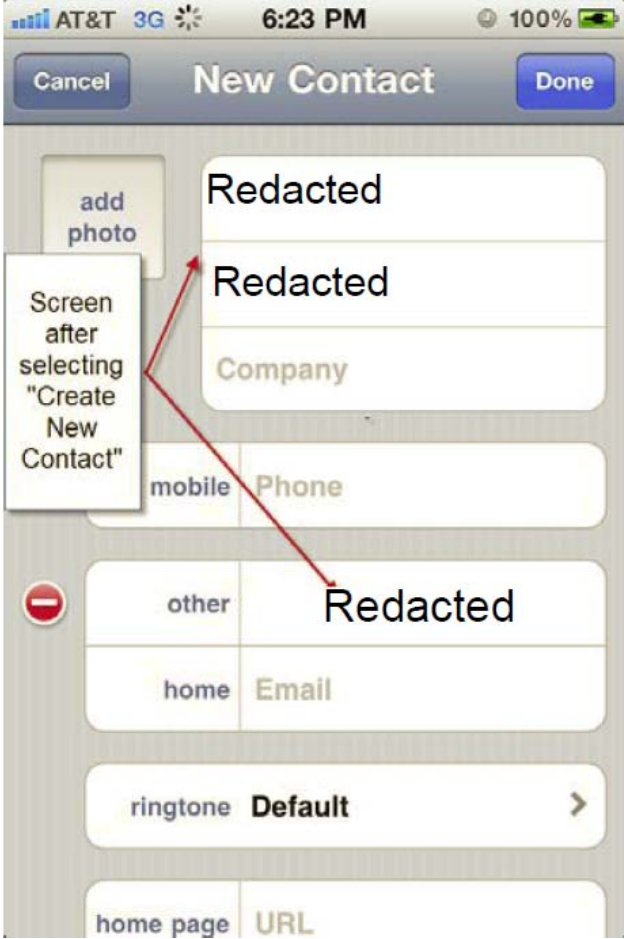
'161 Patent Claim	Accused Apple Products ³
<p>address book, when no information identical to the address information is stored in the address book.</p>	<p>the address book, when no information identical to the address information is stored in the address book. <i>See</i> Claim 1 contentions above. <i>See, e.g.,</i></p> <div data-bbox="926 370 1472 1187" data-label="Image"> <p>The image is a screenshot of an iPhone 4 message interface. At the top, the status bar shows 'AT&T 3G', '6:23 PM', and '100%' battery. Below the status bar is a 'Message' header with a back arrow and the word 'From'. The main content area shows a contact selection screen. It features a placeholder for a contact photo (a person icon) and a name field containing the word 'Redacted'. Below this is a section labeled 'other' followed by another 'Redacted' field. A white box contains two options: 'Create New Contact' and 'Add to Existing Contact'. Two red arrows originate from a text box at the bottom of the screenshot, pointing to these two options. The text box contains the following text: 'Screen after selecting the e-mail address on the previous screen, with prompts to create a new contact or add to an existing contact'.</p> </div> <p>iPhone 4 Screenshot, taken January 3, 2011, MOTO-APPLE-0006037953_126645 (arrows and labels added). As discussed above, Apple Computers generate a drop-down list that prompts the user, if he so wishes, to store the option of adding the address information , when no information identical to the address information is stored in the Apple Computer's Address Book application. <i>See</i> Claim 1 contentions above. <i>See, e.g.,</i> Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641:</p>

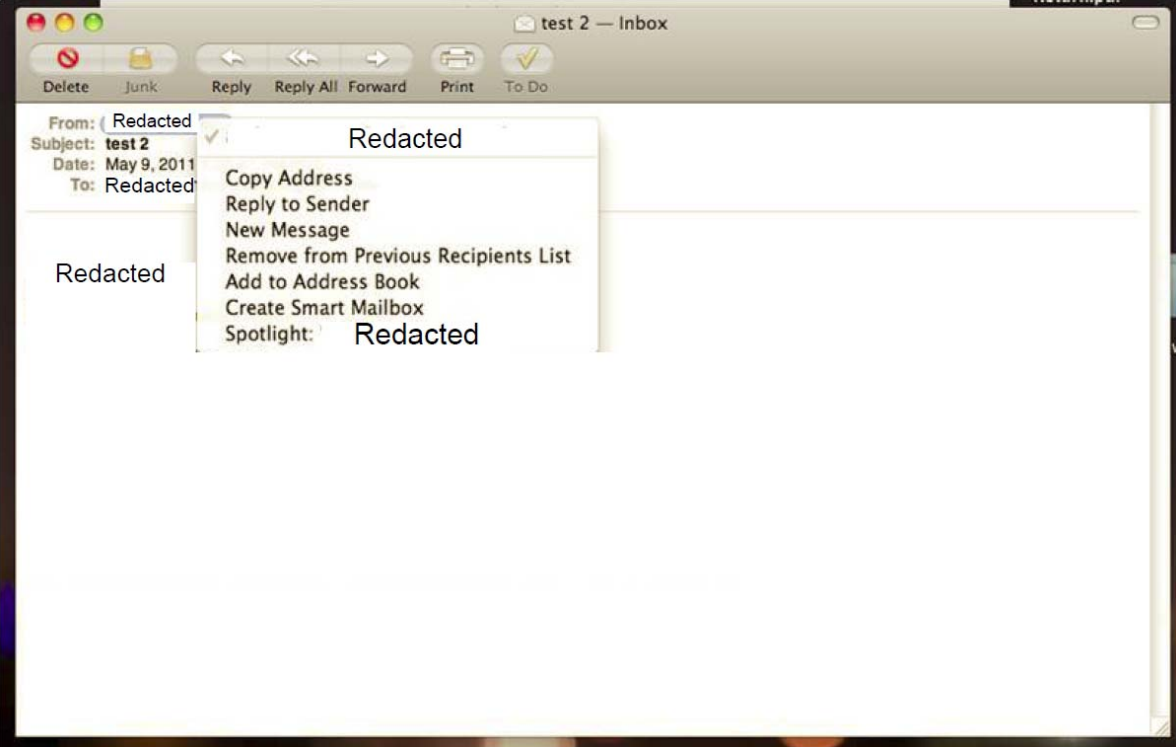
Exhibit F

'161 Patent Claim	Accused Apple Products ³
<p>3. The method of claim 1, wherein the processing step comprises the steps of: generating a prompt inquiring whether a user of the second portable messaging unit wishes to store the address information, when no information identical to the address information is stored in the address book; and</p>	<p>Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of their normal use. Additionally, a user of the Accused Apple Products 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 Apple Products and providing directions for their use. The Accused Apple Products perform the method of Claim 1, wherein the processing step generates a prompt screen inquiring whether the user wishes to store the address information, when no information identical to the address information is stored in the second portable messaging unit's Contacts App (address book). <i>See</i> Claim 1 contentions above. <i>See, e.g.,</i></p>


'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="978 846 1327 1003">Screen after selecting the e-mail address on the previous screen, with prompts to create a new contact or add to an existing contact</p> <p data-bbox="518 1122 1885 1300">iPhone 4 Screenshot, taken January 3, 2011, MOTO-APPLE-0006037953_126645 (arrows and labels added). As discussed above, Apple Computers generate a drop-down list that prompts the user, if he so wishes, to store the option of adding the address information, when no information identical to the address information is stored in the Apple Computer's Address Book application. See Claim 1 contentions above. See, e.g., Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641:</p>


'161 Patent Claim	Accused Apple Products ³
	 <p>The screenshot shows an email client window titled "test 2 — Inbox". The email header includes "From: (Redacted)", "Subject: test 2", "Date: May 9, 2011", and "To: Redacted". A context menu is open over the redacted name, listing actions such as "Copy Address", "Reply to Sender", "New Message", "Remove from Previous Recipients List", "Add to Address Book", "Create Smart Mailbox", and "Spotlight: Redacted".</p>
<p>storing the address information in the address book, in response to an affirmative response to the prompt by the user.</p>	<p>Upon information and belief, as discussed above, Apple iPhones, Apple iPads and iPods store the address information in the Contacts App (address book) in response to an affirmative response to the prompt by the user. <i>See</i> Claim 1 contentions above. <i>See, e.g.,</i></p>

'161 Patent Claim	Accused Apple Products ³
	 <p>iPhone 4 Screenshot, taken January 3, 2011, MOTO-APPLE-0006037953_126646 (arrows and labels added). As discussed above, Apple Computers store the address information in the Address Book Application (address book) in response to an affirmative response to the prompt by the user. See Claim 1 contentions above. See, e.g., Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641:</p>


'161 Patent Claim	Accused Apple Products ³
	 <p>The screenshot shows an email client window titled "test 2 - Inbox". The email header includes "From: (Redacted)", "Subject: test 2", "Date: May 9, 2011", and "To: Redacted". A context menu is open over the redacted address, listing actions such as "Copy Address", "Reply to Sender", "New Message", "Remove from Previous Recipients List", "Add to Address Book", "Create Smart Mailbox", and "Spotlight: Redacted".</p>
<p>5. The method of claim 1, wherein the address information includes a unique user identifier identifying a user of the first portable messaging unit, and</p>	<p>Upon information and belief the Accused Apple Products perform each and every step of this claim in the course of their normal use. Additionally, a user of the Accused Apple Products 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 Apple Products and providing directions for their use. The Accused Apple Products perform the method of Claim 1, wherein the address information discussed above in claim 1 includes a unique user identifier identifying a user of the first portable messaging unit.</p> <p>For example, the address information received can include a cellular telephone number, a user name, or an email address. <i>See</i> Claim 1 contentions above.</p>

'161 Patent Claim	Accused Apple Products ³
<p>wherein the checking step comprises the step of checking whether the unique user identifier is stored in the address book.</p>	<p>Upon information and belief, where an Apple iPhone, Apple iPad, or iPod is the second portable messaging unit, that device will check whether the unique user identifier is stored in the that device's Contacts App (the address book). Where an Apple Computer is the second portable messaging unit, that device will check whether the unique user identifier is stored in the that device's Address Book application (the address book). <i>See</i> Claim 1 contentions above.</p>
<p>9. The method of claim 1, wherein the sending step comprises the step of sending to the second portable messaging unit a return address for routing a message to the first portable messaging unit.</p>	<p>Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of their normal use. Additionally, a user of the Accused Apple Products 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 Apple Products and providing directions for their use. The Accused Apple Products perform the method of Claim 1, wherein the sending step comprises the step of an Apple Accused Product (first portable messaging unit) sending a return address for routing a message to the first portable messaging unit to the second portable messaging unit.</p> <p>For example, a first iPhone 4 (first portable messaging unit) can send to a second iPhone 4 (second portable messaging unit) a telephone number or an email address associated with the first iPhone 4 (return address). <i>See</i> Claim 1 contentions above.</p>
<p>12. A portable messaging unit in a wireless messaging system for facilitating an exchange of address information, the portable messaging unit comprising</p>	<p>Upon information and belief, Apple manufactures, sells, offers for sale, imports, and uses the Accused Apple Products, which are portable messaging units in a wireless messaging system for facilitating the exchange of address information.</p> <p>For example:</p> <p>(1) In a wireless messaging system (<i>e.g.</i>, MobileMe, iCloud, Exchange, Gmail, Yahoo, AOL, etc.), any Accused Apple Product facilitates an exchange of email address information (address information):</p>


'161 Patent Claim	Accused Apple Products ³		
	<div data-bbox="554 289 638 412">  <p>Mail</p> </div> <div data-bbox="726 289 1793 428"> <p>iPhone works with MobileMe, Microsoft Exchange, and many of the most popular email systems—including Yahoo!, Google, and AOL—as well as most industry-standard POP3 and IMAP email systems. View PDFs and other attachments within Mail. Save attached photos and graphics to your Camera Roll album. See Chapter 6, “Mail,” on page 74.</p> </div> <hr/> <p data-bbox="520 488 1730 516"><i>See</i> iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688.</p> <p data-bbox="520 561 1199 589"><i>See also id.</i> at MOTO-APPLE-0006037953_126751:</p> <hr/> <table border="0" data-bbox="537 618 1766 764"> <tr> <td data-bbox="537 618 1094 651">Add an email recipient to your contacts list</td> <td data-bbox="1178 618 1766 764">Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”</td> </tr> </table> <hr/> <p data-bbox="520 824 1787 889"><i>See also</i>, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126647:</p>	Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”
Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”		

'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="562 472 926 505">Amazing by all accounts.</p> <p data-bbox="562 516 1094 792">Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> <div data-bbox="1184 269 1730 976" style="text-align: center;">  </div> <p data-bbox="516 1040 1875 1110"><i>See also, (http://www.apple.com/why-mac/better-hardware/), accessed on May 14, 2011, MOTO-APPLE-0006037953_126649:</i></p>


'161 Patent Claim	Accused Apple Products ³
	<p>Connect fast. Connect easy.</p> <p>With a Mac, you can connect to the Internet fast, thanks to 802.11n Wi-Fi.⁴ Like everything else about a Mac, joining Wi-Fi networks couldn't be simpler. If you've previously connected to a network, your Mac automatically logs you in so you can send email, surf the web, or video chat. Have a phone, headset, keyboard, or mouse with Bluetooth wireless technology? They all connect to your Mac using its built-in Bluetooth 2.1 + EDR technology.</p> <p>(2) In a cellular telephone network (wireless messaging system), Apple iPhones facilitate the exchange of text address information (address information):</p>


'161 Patent Claim	Accused Apple Products ³
	<p style="text-align: center;">Sending and Receiving Messages</p> <div style="border: 1px solid blue; padding: 5px; margin: 10px 0;"> <p>WARNING: For important information about driving safely, see the <i>Important Product Information Guide</i> at www.apple.com/support/manuals/iphone.</p> </div> <p>Messages lets you exchange text messages with anyone using an SMS-capable phone or other device. Messages also supports MMS, so you can send photos, video clips, contact information, and voice memos to other MMS-capable devices. You can enter multiple addressees to send one message to several people.</p> <p>Note: SMS or MMS support may not be available in all countries or regions. Additional fees may apply for use of Messages. Contact your carrier for more information.</p> <p>The Messages icon on the Home screen shows the number of unread messages you have.</p> <div style="text-align: center; margin: 10px 0;">  Number of unread messages </div> <p>You can use Messages whenever you're in range of the cellular network. If you can make a call, you can send a message. Depending on your phone plan, you may be charged for the messages you send or receive.</p> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780. In addition, Apple has performed each and every step of this claim and through its design of the Accused Apple Products, Apple also induced users of the Accused Apple Products to infringe the '161 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 '161 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>, iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688:</p>

'161 Patent Claim	Accused Apple Products ³		
	<hr/> <div data-bbox="554 326 638 412">  </div> <div data-bbox="554 418 615 448"> <p>Mail</p> </div> <div data-bbox="718 321 1801 469"> <p>iPhone works with MobileMe, Microsoft Exchange, and many of the most popular email systems—including Yahoo!, Google, and AOL—as well as most industry-standard POP3 and IMAP email systems. View PDFs and other attachments within Mail. Save attached photos and graphics to your Camera Roll album. See Chapter 6, “Mail,” on page 74.</p> </div> <hr/> <p data-bbox="516 524 1089 557"><i>Id.</i> at MOTO-APPLE-0006037953_126751:</p> <hr/> <table border="0" data-bbox="537 618 1766 764"> <tr> <td data-bbox="537 618 1094 651">Add an email recipient to your contacts list</td> <td data-bbox="1173 618 1766 764">Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”</td> </tr> </table> <hr/> <p data-bbox="516 824 1808 894">(http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:</p>	Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”
Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or “Add to Existing Contact.”		


'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="562 472 926 505">Amazing by all accounts.</p> <p data-bbox="562 516 1094 792">Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> <div data-bbox="1184 269 1730 976" style="text-align: center;">  </div> <p data-bbox="520 1040 1877 1401">Apple also knew that offering to sell or selling the Accused Apple Products would contribute to direct infringement of the '161 Patent. 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 '161 Patent. Apple knew that the Accused Apple Products contain a specific software component for facilitating the exchange of address information, a component with no substantial non-infringing use, which 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, users of the Accused Apple Products have, in fact, combined these components into an infringing method. 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., MOTO-</i></p>

'161 Patent Claim	Accused Apple Products ³
	APPLE-0006037953_126688, MOTO-APPLE-0006037953_126751, and MOTO-APPLE-0006037953_126647, above.
<p>a transmitter for sending address information to another portable messaging unit through the wireless messaging system</p>	<p>Upon information and belief, all Accused Apple Products have a transmitter for sending address information to another portable messaging unit (<i>e.g.</i>, another Accused Apple Product) through the wireless messaging system. For example:</p> <p>1) Apple iPhones and Apple iPads with 3G contain cellular hardware and software (transmitter) for sending text message and/or email address information to another portable messaging unit, <i>e.g.</i>, an Apple iPhone through a cellular telephone network (wireless messaging system):</p> <hr/> <p style="text-align: center;">Cellular and wireless</p> <ul style="list-style-type: none"> ■ GSM model: UMTS/HSDPA/HSUPA (850, 900, 1900, 2100 MHz); GSM/EDGE (850, 900, 1800, 1900 MHz) ■ CDMA model: CDMA EV-DO Rev. A (800, 1900 MHz) ■ 802.11b/g/n Wi-Fi (802.11n 2.4GHz only) ■ Bluetooth 2.1 + EDR wireless technology <hr/> <p>iPhone 4 Technical Specifications, (http://www.apple.com/iphone/specs.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126659.</p> <p><i>See also</i> iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.</p>

'161 Patent Claim	Accused Apple Products ³
	<p style="text-align: center;">Sending and Receiving Messages</p> <div style="border: 1px solid blue; padding: 5px; margin: 10px 0;"> <p>WARNING: For important information about driving safely, see the <i>Important Product Information Guide</i> at www.apple.com/support/manuals/iphone.</p> </div> <p>Messages lets you exchange text messages with anyone using an SMS-capable phone or other device. Messages also supports MMS, so you can send photos, video clips, contact information, and voice memos to other MMS-capable devices. You can enter multiple addressees to send one message to several people.</p> <p>Note: SMS or MMS support may not be available in all countries or regions. Additional fees may apply for use of Messages. Contact your carrier for more information.</p> <p>The Messages icon on the Home screen shows the number of unread messages you have.</p> <div style="text-align: center; margin: 10px 0;">  Number of unread messages </div> <p>You can use Messages whenever you're in range of the cellular network. If you can make a call, you can send a message. Depending on your phone plan, you may be charged for the messages you send or receive.</p> <p>2) All Accused Apple Products contain wireless hardware (transmitter) allowing it to send, <i>e.g.</i>, email address information to another portable messaging unit (<i>e.g.</i>, another Accused Apple Product) though a wireless messaging system (MobileMe, iCloud, Exchange, Gmail, Yahoo, AOL, etc.):</p>

'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="558 313 1035 480">Mail, Contacts, and Calendar. In sync on all your devices.</p> <p data-bbox="558 509 1003 805">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 which device you use, all your information is up to date — no docking required.</p>  <p data-bbox="516 894 1818 963">MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p> <p data-bbox="516 1003 1829 1071">See iPad Features, (http://www.apple.com/ipad/features/), accessed on May 14, 2011, MOTO-APPLE-0006037953_127244-45:</p>

'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="596 305 743 407">  </div> <div data-bbox="886 311 1092 402">  </div> <div data-bbox="1192 293 1373 402">  </div> <p data-bbox="596 444 1394 553"> Wi-Fi and 3G. Two great ways to stay connected. </p> <p data-bbox="596 574 1436 818"> Every iPad is built with advanced 802.11n wireless technology. It automatically finds Wi-Fi networks, which you can join with a few taps. iPad is also available with 3G connectivity on either AT&T or Verizon Wireless networks. So if you're somewhere without Wi-Fi, such as outdoors on a camping trip or on the road, you can still surf the web, check email, or get directions.⁶ </p> <p data-bbox="596 824 1041 857"> Learn more about Wi-Fi and 3G ▶ </p> <p data-bbox="516 943 1848 1010"> <i>See also iPad Built-in-Apps, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126647:</i> </p>


'161 Patent Claim	Accused Apple Products ³
	<p data-bbox="562 475 919 505">Amazing by all accounts.</p> <p data-bbox="562 521 1087 792">Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems.</p> <div data-bbox="1182 269 1726 976" style="text-align: center;">  </div> <p data-bbox="520 1081 1860 1146"><i>See also iPhone Features, (http://www.apple.com/iphone/features/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126648:</i></p>

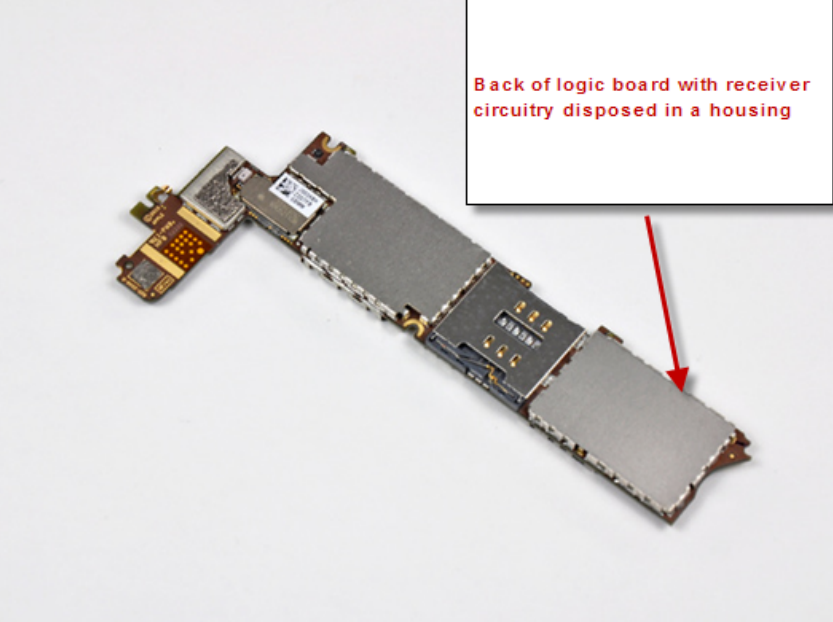
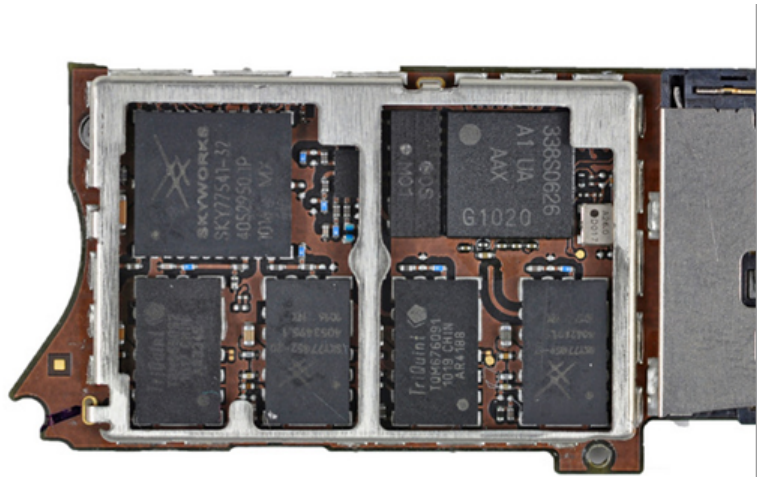
'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="556 300 651 389" data-label="Image"> </div> <div data-bbox="661 300 1270 381" data-label="Section-Header"> <h2>Mail</h2> <p>Mobile email like you've never seen it before.</p> </div> <div data-bbox="598 576 861 609" data-label="Section-Header"> <h3>Have email, will travel.</h3> </div> <div data-bbox="598 617 955 982" data-label="Text"> <p>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.*</p> </div> <div data-bbox="1018 430 1722 1112" data-label="Image"> </div> <div data-bbox="514 1153 1879 1226" data-label="Text"> <p>See also, (http://www.apple.com/why-mac/better-hardware/), accessed on May 14, 2011, MOTO-APPLE-0006037953_126649:</p> </div>

'161 Patent Claim	Accused Apple Products ³
	<p>Connect fast. Connect easy.</p> <p>With a Mac, you can connect to the Internet fast, thanks to 802.11n Wi-Fi.⁴ Like everything else about a Mac, joining Wi-Fi networks couldn't be simpler. If you've previously connected to a network, your Mac automatically logs you in so you can send email, surf the web, or video chat. Have a phone, headset, keyboard, or mouse with Bluetooth wireless technology? They all connect to your Mac using its built-in Bluetooth 2.1 + EDR technology.</p>
<p>a receiver coupled to the processing system for receiving second address information from another portable messaging unit</p>	<p>Upon information and belief, the Accused Apple Products each have a receiver coupled to the processing system for receiving second address information from another portable messaging unit.</p> <p>For example, the Apple iPhone contains a logic board with receiver circuitry (receiver coupled to the processing system) that allows the Apple iPhone to receive, <i>e.g.</i>, email and text message address information from another Apple iPhone (another portable messaging unit).</p> <p><i>See, e.g.</i>, iPhone 3G Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127192-95 (arrows and labels added):</p>

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

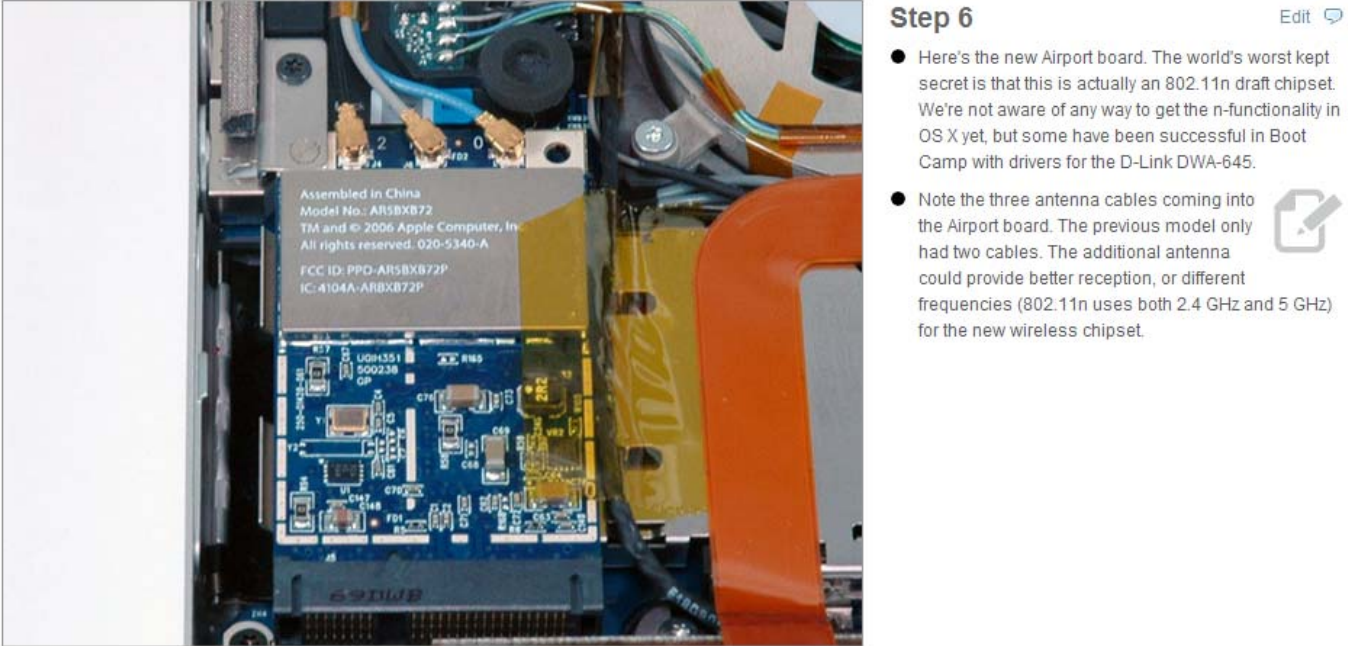
Exhibit F

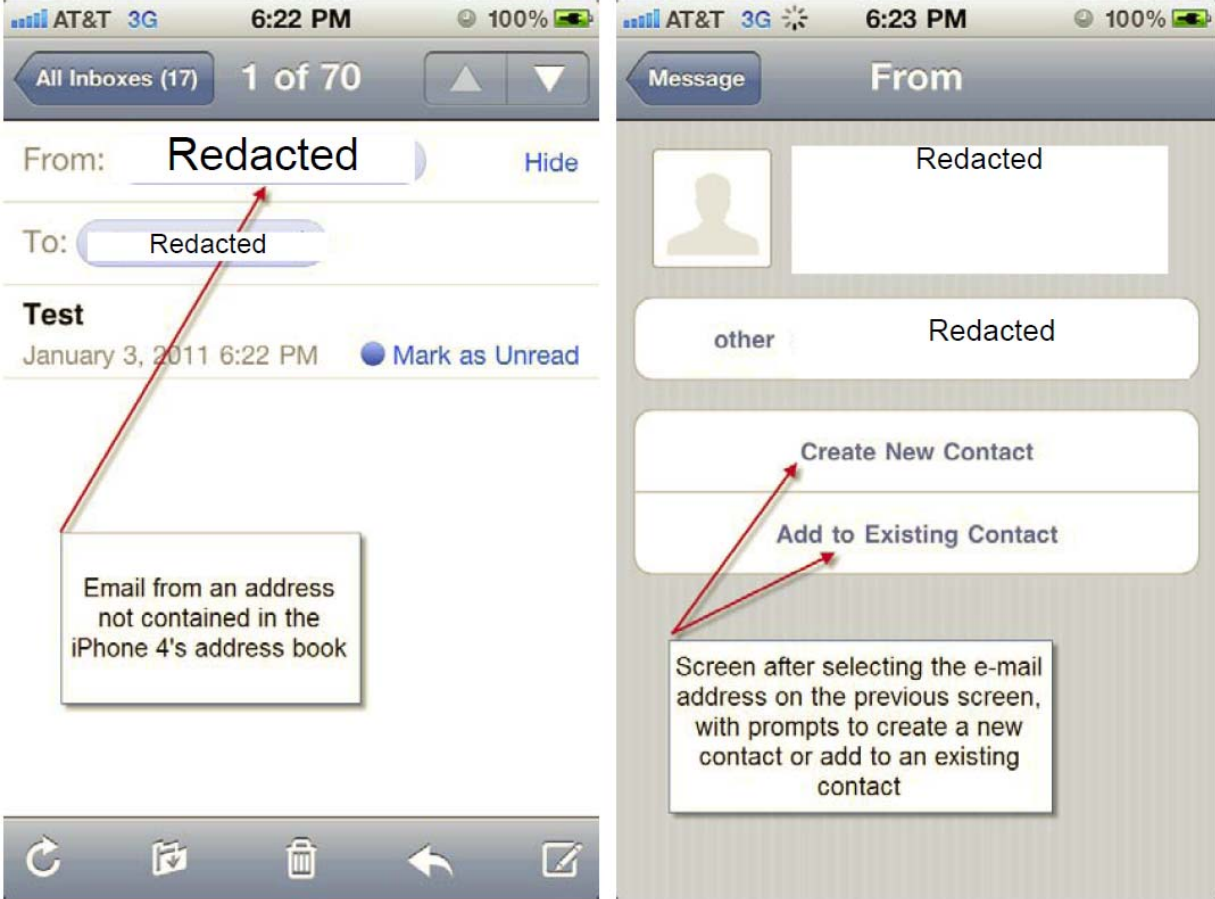
'161 Patent Claim	Accused Apple Products ³
	

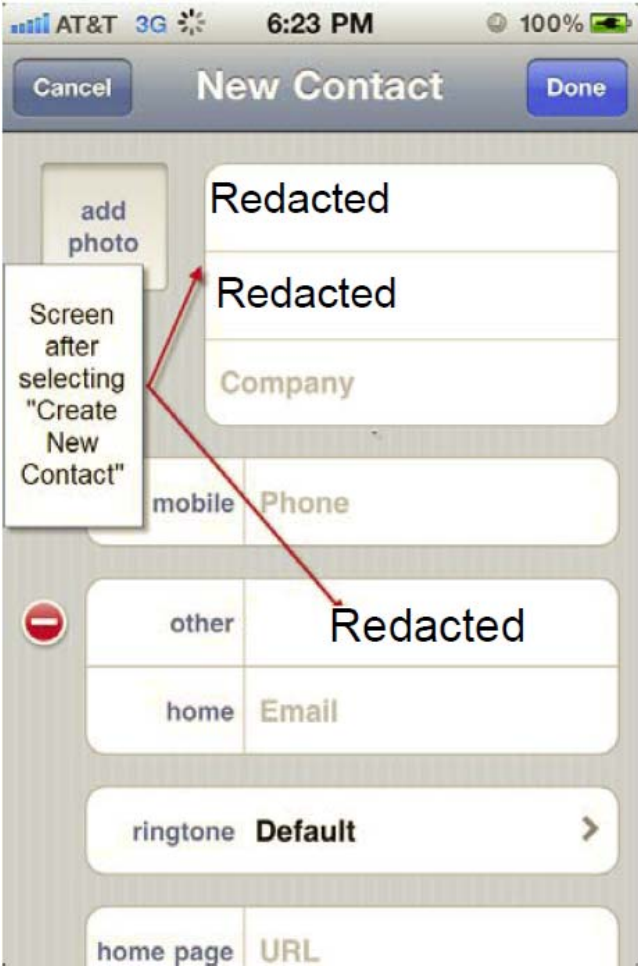
'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="520 266 1360 894" style="text-align: center;">  <p data-bbox="989 266 1354 475" style="color: red; border: 1px solid black; padding: 5px; display: inline-block;">Back of logic board with receiver circuitry disposed in a housing</p> </div> <div data-bbox="541 932 1293 1406" style="text-align: center;">  </div> <div data-bbox="1318 932 1732 1170" style="margin-top: 20px;"> <ul style="list-style-type: none"> ● On the top of logic board: <ul style="list-style-type: none"> ● Skyworks SKY77542 Tx-Rx iPAC™ FEM for Dual-Band GSM/GPRS: 880–915 MHz and 1710–1785 MHz bands. ● Skyworks SKY77541 GSM/GRPS Front End Module ● STMicro STM333DH 3-axis accelerometer ● TriQuint TQM676091 ● 338S0626 </div>

'161 Patent Claim	Accused Apple Products ³
	<p>For example, the Apple iPhone contains a logic board with receiver circuitry (receiver coupled to the processing system) that allows the Apple iPhone to receive, e.g., email address information from another Accused Apple Product (another portable messaging unit).</p> <p>See, e.g., iPad 3G Teardown, (http://www.ifixit.com/Teardown/iPad-3G-Teardown/2374/2), accessed on May 14, 2011, MOTO-APPLE-0006037953_127230-31:</p> <div style="display: flex; align-items: flex-start;"> <div style="flex: 1;">  </div> <div style="flex: 1; padding-left: 20px;">  <p>Step 13 Edit </p> <ul style="list-style-type: none"> ● The 3G board with A4 processor. ● The second shot is the main board from the Wi-Fi iPad. ● Key differences? <ul style="list-style-type: none"> ● The most obvious change is the addition of the connector on the right side of the board for the communications board. ● More subtle is an additional small IC above the A4 chip next to the connector for the GPS antenna. This may be a signal processor, but we can't firmly identify it: T3J 927 632567. </div> </div>

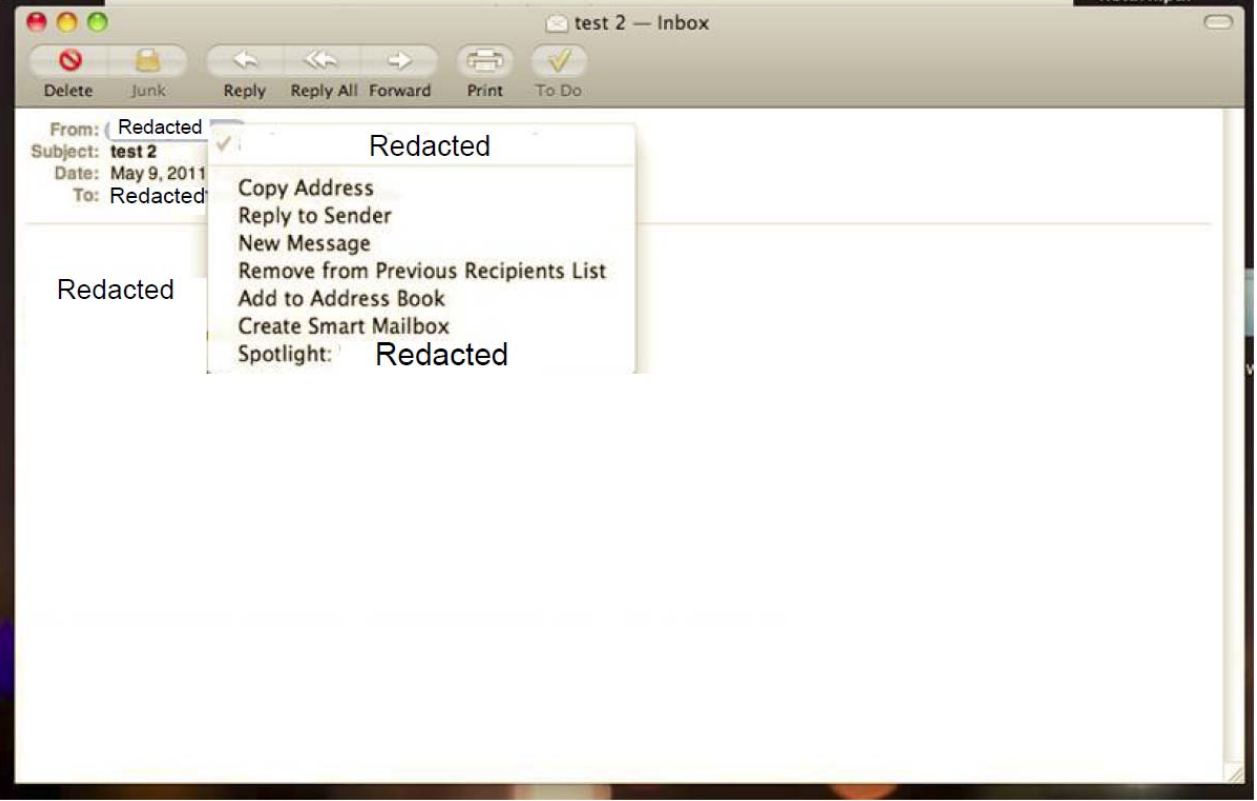
'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="552 269 1274 813" data-label="Image"> </div> <div data-bbox="1293 269 1545 362" data-label="Image"> </div> <div data-bbox="1293 386 1680 941" data-label="List-Group"> <p>Step 15 Edit</p> <ul style="list-style-type: none"> ● Apple soldered the EMI shield onto the communications board, making it challenging for us to show you the chips. Despite this adversity, we pressed forward undaunted, fearlessly unsoldering the board to reveal to you: <ul style="list-style-type: none"> ● Infineon 337S3754 PMB 8878 X-Gold baseband IC 5Y06115. This part had the Infineon logo in the pre-production unit, but Apple has white-labeled it to obscure the manufacturer. This is the exact same baseband processor as the iPhone 3GS. ● Skyworks SKY77340 Power Amplifier Module ● Three TriQuint power amplifier / filters. ● Infineon U6952 ● Numonyx 36MY1EE ● Along the right are three TriQuint power amplifiers: TQM616035A, TQM666032B, and TQM676031A. These are the same three chips that Apple used in the iPhone 3G nearly 2 years ago. ● Broadcom A-GPS BCM47501UBG F01003 P11 949871 SN </div> <div data-bbox="516 964 1848 1068" data-label="Text"> <p>For example, the Apple Computer contains a logic board with receiver circuitry (receiver coupled to the processing system) that allows the Apple Computer to receive, <i>e.g.</i>, email address information from another Accused Apple Product (another portable messaging unit).</p> </div> <div data-bbox="516 1110 1839 1214" data-label="Text"> <p>See, <i>e.g.</i>, MacBook Pro 15" Core 2 Duo Model A1211 Teardown, (http://www.ifixit.com/Teardown/MacBook-Pro-15-Inch-Core-2-Duo-Model-A1211-Teardown/593/1), accessed on May 14, 2011, MOTO-APPLE-0006037953_127250:</p> </div>


'161 Patent Claim	Accused Apple Products ³
	
<p>where the processing system is programmed to: check in response to receiving the second address information, whether information identical to the second address information is stored in an address book of the portable messaging unit; and</p>	<p>Upon information and belief, the processing system in any Accused Apple Devices is programmed to check in response to receiving the second address information whether information identical to the second address information is stored in its address book. For example:</p> <p>(1) where the portable messaging unit is an Apple iPhone, iPad, or iPod Touch that has received the second address information, it will check whether information identical to the address information contained in the email is stored in the Contacts App (address book) of the second Apple iPhone. If not, a prompt screen is displayed upon user selection of the email address, and the user can then either create a new contact or add it to an existing contact:</p>

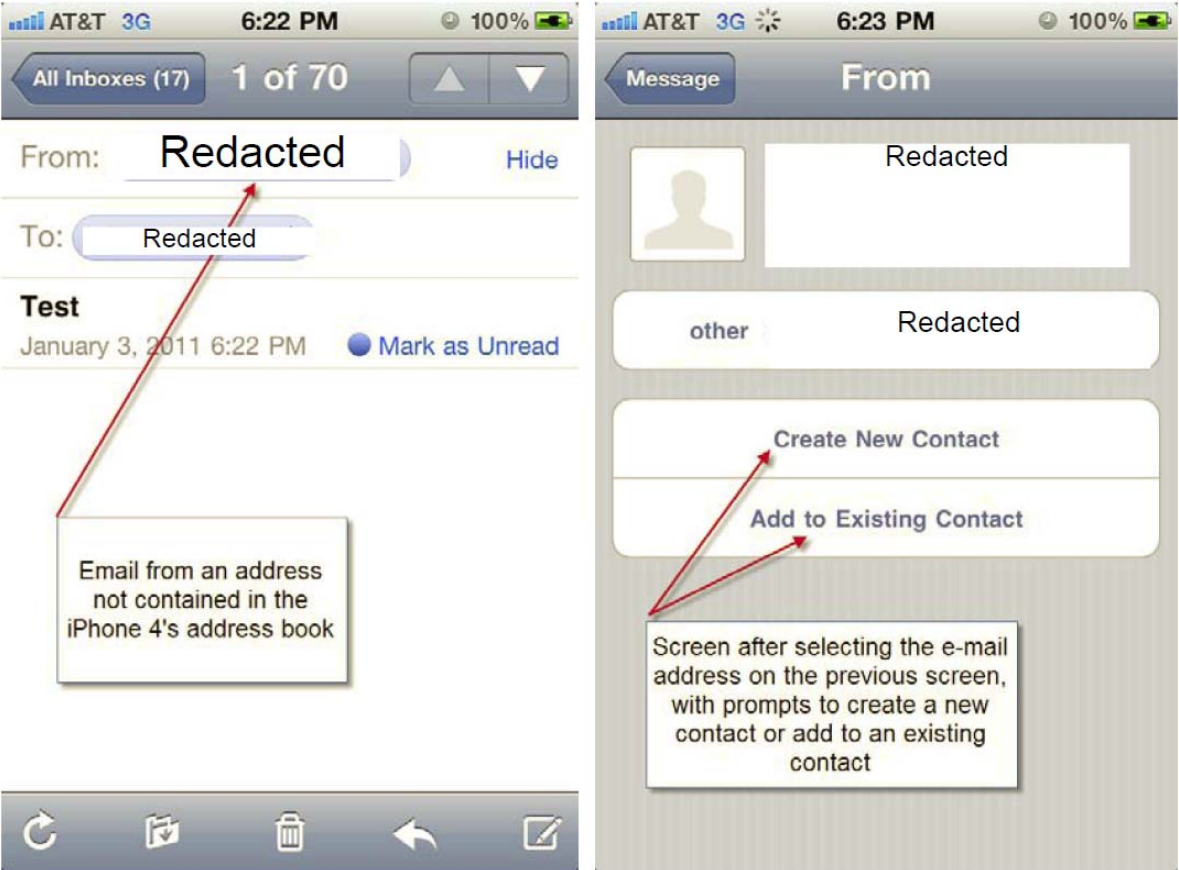
'161 Patent Claim	Accused Apple Products ³
	 <p>The image displays two screenshots from an iPhone 4, illustrating the user interface for handling an email from an unknown contact. The left screenshot, taken at 6:22 PM, shows an email in the 'All Inboxes (17)' view. The sender is redacted, and the subject is 'Test'. A callout box points to the redacted sender address, stating: "Email from an address not contained in the iPhone 4's address book". The right screenshot, taken at 6:23 PM, shows the 'Message' screen with the sender's name redacted. Below the name, there are two options: "Create New Contact" and "Add to Existing Contact". A callout box points to these options, stating: "Screen after selecting the e-mail address on the previous screen, with prompts to create a new contact or add to an existing contact".</p>

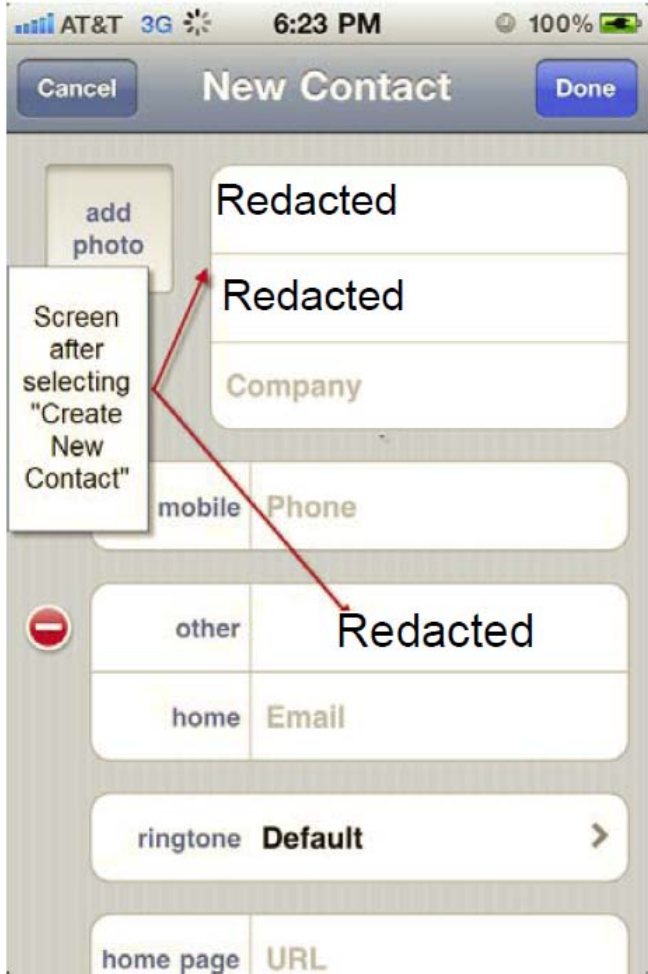
'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="520 1279 1843 1349">See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126645-46 (arrows and labels added).</p> <p data-bbox="520 1386 1787 1421">See also iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126751.</p>

'161 Patent Claim	Accused Apple Products ³
	<div data-bbox="533 321 1764 470" style="border: 1px solid blue; padding: 5px;"> <p>Add an email recipient to your contacts list Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or "Add to Existing Contact."</p> </div> <hr style="border-top: 1px dashed black;"/> <p>Where the second portable messaging unit is an Apple Computer that has received the second address information, it will check whether information identical to the address information contained in the email is stored in the Address Book Application (address book) of the second portable messaging unit. If not, the Apple Computers generates a drop-down list that prompts the user, if he so wishes, to store the option of adding the address information.</p>

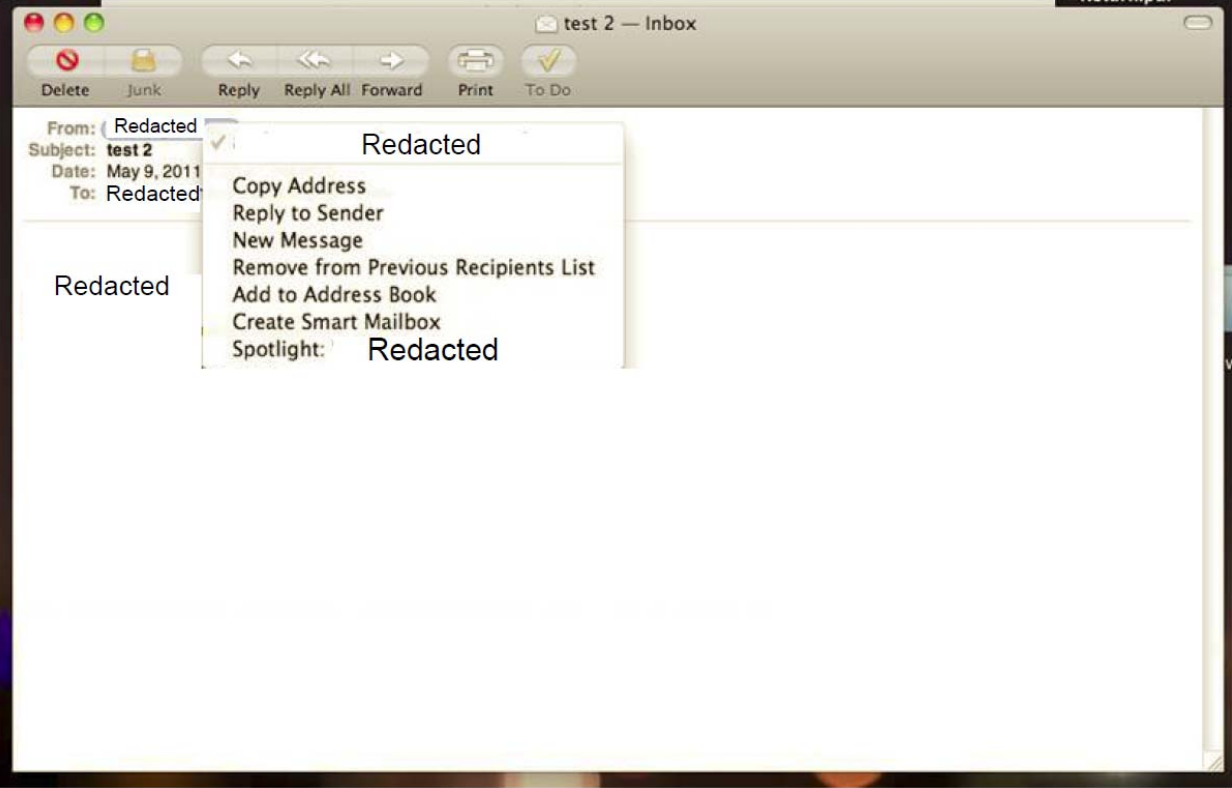
'161 Patent Claim	Accused Apple Products ³
	 <p>The screenshot shows a Mac OS X Mail application window titled "test 2 - Inbox". The email header includes "From: (Redacted)", "Subject: test 2", "Date: May 9, 2011", and "To: Redacted". A context menu is open over the recipient name "Redacted", listing options: "Copy Address", "Reply to Sender", "New Message", "Remove from Previous Recipients List", "Add to Address Book", "Create Smart Mailbox", and "Spotlight: Redacted".</p> <p>Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641.</p> <hr/> <p>(2) Where a text message containing address information (address information) is received, a second Apple iPhone (second messaging unit) checks to determine whether information identical to the address information contained in the text message is stored in the address book of the second Apple iPhone. If not, the second Apple iPhone creates a prompt button upon user selection of the text message, which allows the user to select the email address and either create a new contact or add it to an existing contact:</p>


'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="516 1166 1816 1230">See iPhone 4 Screen, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).</p>
<p>process the second address information in a predetermined</p>	<p>Upon information and belief, the Accused Apple Products process the address information in a predetermined manner selected in response to whether information identical to the second address information is stored in the address book. For example,</p>


'161 Patent Claim	Accused Apple Products ³
<p>manner selected in response to whether information identical to the second address information is stored in the address book.</p>	<p>(1) Where an email message containing address information (address information) is received, a second Apple iPhone (second messaging unit) checks to determine whether information identical to the address information contained in the email is stored in the address book of the second Apple iPhone. If not, the second Apple iPhone creates a prompt screen upon user selection of the email address, which allows the user to select the email address and either create a new contact or add it to an existing contact:</p>  <p>The image contains two screenshots from an iPhone 4. The left screenshot shows an email interface with a status bar at the top displaying 'AT&T 3G', '6:22 PM', and '100%' battery. Below the status bar is a navigation bar with 'All Inboxes (17)' and '1 of 70'. The email header shows 'From: Redacted' and 'To: Redacted'. The subject is 'Test' and the date is 'January 3, 2011 6:22 PM'. A red arrow points from a text box below to the redacted 'From' field. The right screenshot shows the 'Message' screen with a status bar at the top displaying 'AT&T 3G', '6:23 PM', and '100%' battery. Below the status bar is a navigation bar with 'Message' and 'From'. The 'From' field contains a redacted name. Below the 'From' field is a contact selection menu with options 'other' and 'Redacted'. Below the 'Redacted' option are two buttons: 'Create New Contact' and 'Add to Existing Contact'. A red arrow points from a text box below to these two buttons.</p> <p>Email from an address not contained in the iPhone 4's address book</p> <p>Screen after selecting the e-mail address on the previous screen, with prompts to create a new contact or add to an existing contact</p>

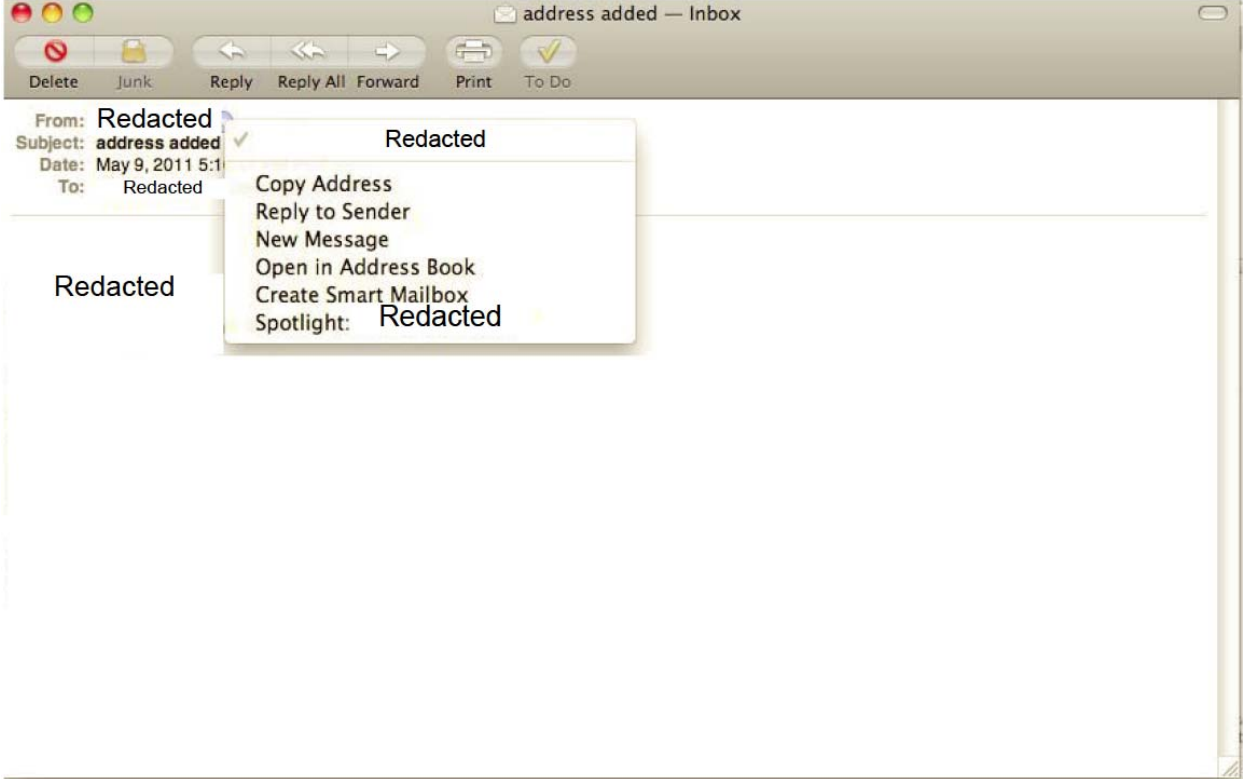
'161 Patent Claim	Accused Apple Products ³
	 <p>The screenshot shows the 'New Contact' screen on an iPhone 4. The status bar at the top displays 'AT&T 3G', '6:23 PM', and '100%' battery. The screen has a 'Cancel' button on the left and a 'Done' button on the right. The main content area contains several input fields: 'add photo' (with a redacted name), 'Company', 'mobile Phone', 'other Redacted', 'home Email', 'ringtone Default', and 'home page URL'. A white callout box on the left contains the text 'Screen after selecting "Create New Contact"', with two red arrows pointing to the redacted name field and the 'other Redacted' field.</p>
	<p>See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126645-46 (arrows and labels added).</p>

'161 Patent Claim	Accused Apple Products ³		
	<p data-bbox="520 305 1692 337"><i>See also</i> User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126751:</p> <hr data-bbox="520 386 1801 389"/> <table border="0" data-bbox="520 397 1801 560"> <tr> <td data-bbox="520 397 1171 560">Add an email recipient to your contacts list</td> <td data-bbox="1171 397 1801 560">Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or "Add to Existing Contact."</td> </tr> </table> <hr data-bbox="520 560 1801 563"/> <p data-bbox="520 651 1881 829">Where an email message containing address information (address information) is received, a second Apple Computer (second messaging unit) checks to determine whether information identical to the address information contained in the email is stored in the address book of the second Apple Computer. If not, the Apple Computers generates a drop-down list that prompts the user, if he so wishes, to store the option of adding the address information.</p>	Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or "Add to Existing Contact."
Add an email recipient to your contacts list	Tap the message and, if necessary, tap Details to see the recipients. Then tap a name or email address and tap Create New Contact or "Add to Existing Contact."		

'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="512 1089 1696 1125">See Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641.</p> <p data-bbox="512 1166 1894 1344">(2) Where a text message containing address information (address information) is received, a second Apple iPhone (second messaging unit) checks to determine whether information identical to the address information contained in the text message is stored in the address book of the second Apple iPhone. If not, the second Apple iPhone creates a prompt button upon user selection of the text message, which allows the user to select the email address and either create a new contact or add it to an existing contact:</p>

'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="518 1130 1881 1198">See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).</p> <hr data-bbox="518 1235 1881 1239"/> <p data-bbox="518 1287 1808 1356">If identical information is stored in the address book, the contact's name is displayed at the top of the screen and a "Contact Info" prompt is added:</p>

'161 Patent Claim	Accused Apple Products ³
	 <p data-bbox="516 1084 1881 1154"><i>See</i> iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126644 (arrows and labels added).</p> <p data-bbox="516 1192 1755 1227"><i>See also</i> Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126642:</p>

<p>'161 Patent Claim</p>	<p>Accused Apple Products³</p>
	 <p>The screenshot shows an email client window titled "address added — Inbox". The email header includes: "From: Redacted", "Subject: address added", "Date: May 9, 2011 5:1", and "To: Redacted". A context menu is open over the recipient name "Redacted", listing options: "Copy Address", "Reply to Sender", "New Message", "Open in Address Book", "Create Smart Mailbox", and "Spotlight: Redacted". The main body of the email is also redacted.</p>
<p>13. The method of claim 12, wherein the processing system is further programmed to store the second address information in the address book, when no information identical to the second</p>	<p>Upon information and belief, Apple manufactures, sells, offers for sale, imports, and uses the Accused Apple Products, which are portable messaging units according to claim 12, wherein the processing system of the Accused Apple Products are programmed to store the second address information in the address book, when no information identical to the second address information is stored in the address book. <i>See, e.g.,</i></p>


'161 Patent Claim	Accused Apple Products ³
<p>address information is stored in the address book.</p>	 <p>The screenshot shows an iPhone 4 messaging interface. At the top, the status bar displays 'AT&T 3G', '6:23 PM', and '100%' battery. Below the status bar is a 'Message' header with a back arrow and the word 'From'. The main content area shows a redacted name and a redacted phone number. Below this is a section with two options: 'Create New Contact' and 'Add to Existing Contact'. Two red arrows point from a text box at the bottom to these two options. The text box contains the following text: 'Screen after selecting the e-mail address on the previous screen, with prompts to create a new contact or add to an existing contact'.</p> <p>iPhone 4 Screenshot, taken January 3, 2011, MOTO-APPLE-0006037953_126645 (arrows and labels added). As discussed above, Apple Computers generate a drop-down list that prompts the user, if he so wishes, to store the option of adding the address information, when no information identical to the address information is stored in the Apple Computer's Address Book application. See Claim 12 contentions above. See, e.g., Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641:</p>
<p>14. The portable messaging unit of claim</p>	<p>Upon information and belief, Apple manufactures, sells, offers for sale, imports, and uses the Accused Apple Products, which are portable messaging units according to claim 12, wherein the processing system</p>

Exhibit F

'161 Patent Claim	Accused Apple Products ³
<p>12, wherein the processing system is further programmed to generate a prompt inquiring whether a user of the portable messaging unit wishes to store the address information, when no information identical to the second address information is stored in the address book; and</p>	<p>of the Accused Apple Products are programmed to generate a prompt inquiring whether a user wishes to store address information, when no information identical to the second address information is stored in the address book. <i>See</i> Claim 12 contentions above.</p>
<p>store the second address information in the address book, in response to an affirmative response to the prompt by the user.</p>	<p>Upon information and belief, the Accused Apple Products store the second address information in the address book, in response to an affirmative response to the prompt by the user. <i>See</i> Claim 12 contentions above.</p>