EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

          Plaintiff,

v.

APPLE INC.,

          Defendant.

APPLE INC.,

          Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

          Counterclaim Defendants.

JURY TRIAL DEMANDED

**DEFENDANT MOTOROLA MOBILITY, INC.'S
PRELIMINARY INFRINGEMENT CONTENTIONS**

Defendant Motorola Mobility, Inc. ("Motorola") hereby sets forth the asserted claims from U.S. Patents Nos. 5,710,987, 5,754,119, 5,958,006, 6,008,737, 6,101,531, and 6,377,161, the Apple products that infringe those claims, and Motorola's preliminary infringement contentions. Motorola's investigation is ongoing, and discovery and claim construction are not yet complete. Motorola reserves the right to amend or supplement the asserted claims, accused Apple products, and/or preliminary infringement contentions set forth below as additional information becomes available.

Patent	Claims	Accused Products	Exhibit
5,710,987	13, 14, 17	Apple iPhone 4	Ex. A
5,754,119	1, 2, 5	MobileMe, Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4G, Apple iPad with 3G, Apple iPad 2 with 3G, and Apple iPod Touch.	Ex. B
5,958,006	12, 26	MobileMe, Apple iPhone 3G, Apple iPhone 3G S, Apple iPhone 4G, Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, Apple iPod Touch, Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro.	Ex. C
6,008,737	9	Apple iPhone 3G, Apple iPhone 3GS, and Apple iPhone 4G , Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, Apple iPod Touch, Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro.	Ex. D
6,101,531	1, 2, 11	Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4G, 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, and MobileMe.	Ex. E
6,377,161	1-3, 5, 9, 12-14	Apple iPhone 3G, Apple iPhone 3GS, and Apple iPhone 4G, Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, Apple iPod Touch, Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro, and MobileMe.	Ex. F

Dated: May 18, 2011

Respectfully submitted,

MOTOROLA MOBILITY, INC.

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*Attorneys for Plaintiff and Counterclaim-
Defendant Motorola Mobility, Inc.*

Exhibit A

<div align="center">

UNITED STATES PATENT NO. 5,710,987

PRELIMINARY INFRINGEMENT CONTENTIONS[1]

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Accused Apple Product: Apple iPhone 4

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

Exhibit A

'987 Patent Claim	Apple iPhone 4
	See also iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949-50: **Stainless Steel Band** Created from our own alloy, then forged to be five times stronger than standard steel, the CNC–machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas. **Mic + Speaker** While most phones have only one microphone, iPhone 4 has two. The main mic, located on the bottom next to the dock connector, is for phone calls, voice commands, and memos. The second mic, built into the top near the headphone jack, is for FaceTime calls and for making your phone calls better. It works with the main mic to suppress unwanted and distracting background sounds, such as music and loud conversations. This dual–mic noise suppression helps make every conversation a quiet one.
a housing;	Upon information and belief, the Apple iPhone 4 contains a housing .

Exhibit A

'987 Patent Claim	Apple iPhone 4
	See e.g., iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193 (arrows and labels added): See *e.g.*, iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1), accessed on May 13, 2011, MOTO-APPLE-0006037953_127208 (arrows and labels added):

Exhibit A

'987 Patent Claim	Apple iPhone 4
	  See also iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126952:

Exhibit A

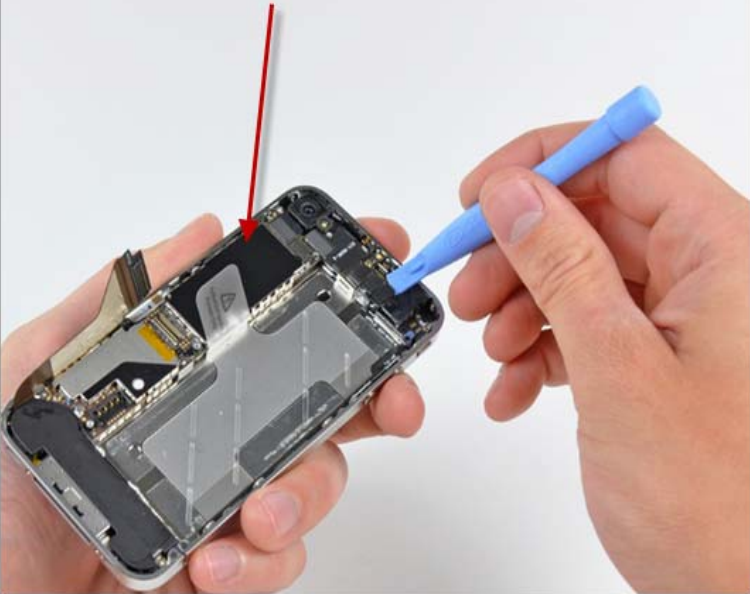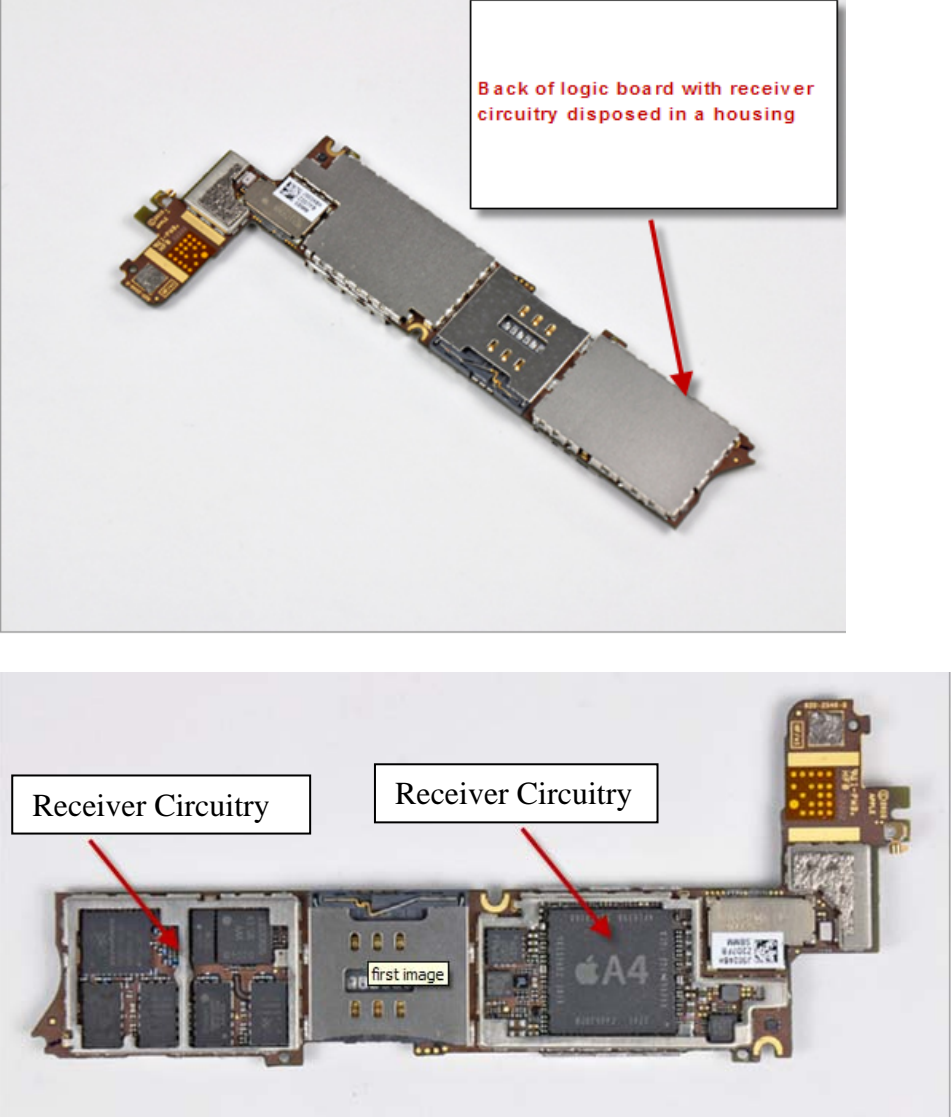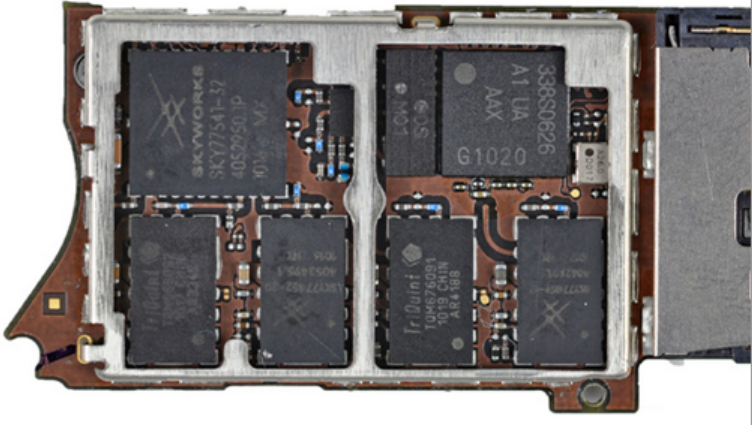| '987 Patent Claim	Apple iPhone 4
receiver circuitry disposed in the housing; and	Upon information and belief, the Apple iPhone 4 has receiver circuitry disposed in the housing. *See, e.g.*, iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127192-94 (arrows and labels added):

Exhibit A

'987 Patent Claim	Apple iPhone 4

Step 10

● 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 A

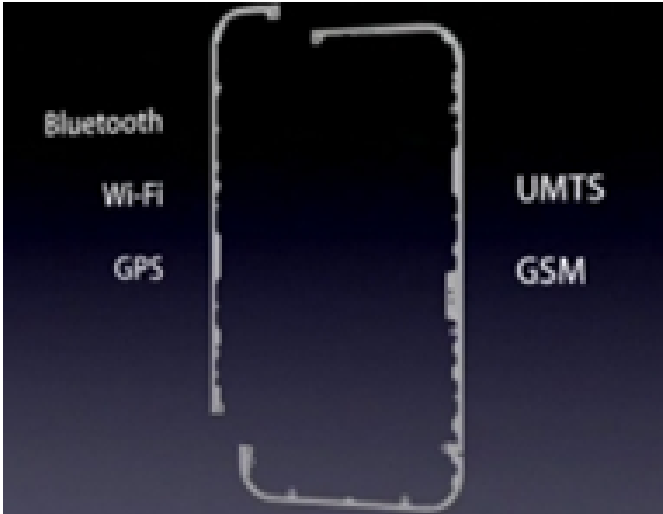| '987 Patent Claim	Apple iPhone 4

Exhibit A

'987 Patent Claim	Apple iPhone 4
	Back of logic board with receiver circuitry disposed in a housing Receiver Circuitry Receiver Circuitry first image A4

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Exhibit A

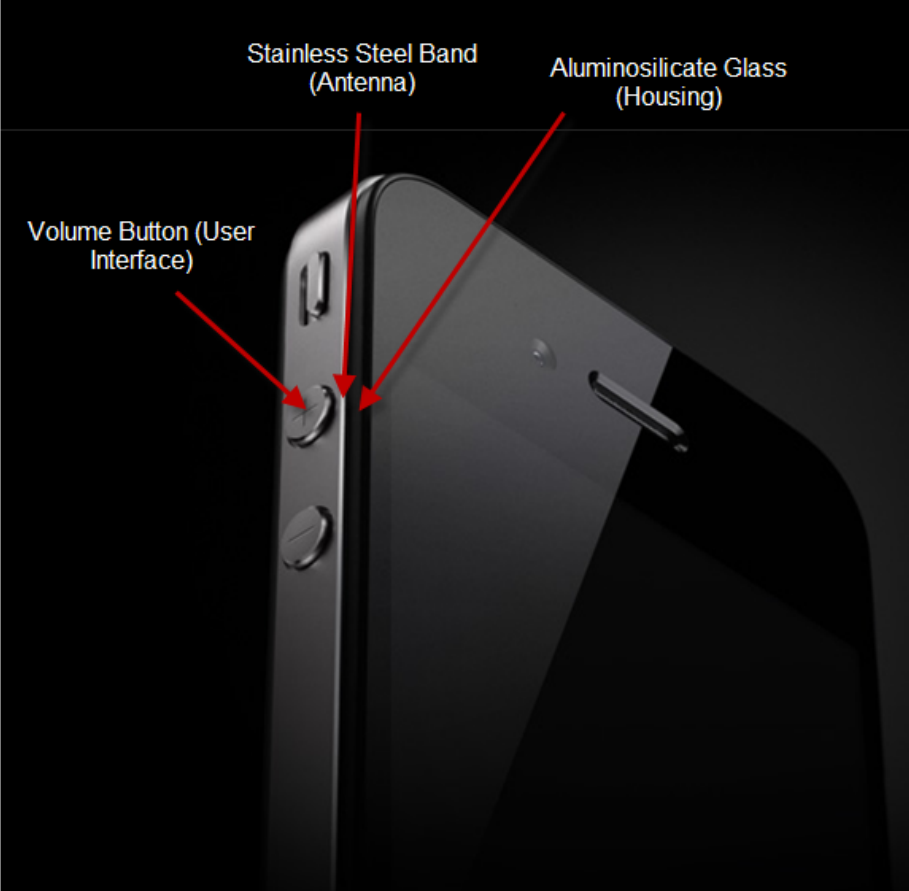| '987 Patent Claim	Apple iPhone 4
	On the top of logic board: • Skyworks SKY77542 Tx–Rx iPAC™ FEM for Dual-Band GSM/GPRS: 880–915 MHz and 1710–1785 MHz bands. • Skyworks SKY77541 GSM/GRPS Front End Module • STMicro STM33DH 3-axis accelerometer • TriQuint TQM676091 • 338S0626

Exhibit A

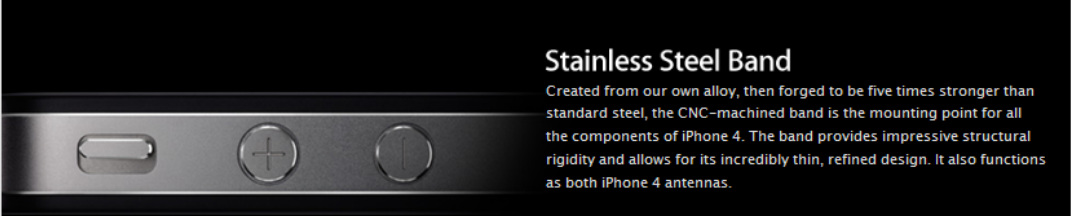| '987 Patent Claim	Apple iPhone 4
	See also iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1), accessed on May 13, 2011, MOTO-APPLE-0006037953_127208 (arrows and labels added):
an antenna coupled to the receiver circuitry;	Upon information and belief, the Apple iPhone 4 contains a cellular antenna and a Wi-Fi and Bluetooth antenna, each of which is coupled to the receiver circuitry. The stainless steel band on the outside of the iPhone 4 is coupled to and is part of both of the iPhone 4 antennas. *See, e.g.*, iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-

Exhibit A

'987 Patent Claim	Apple iPhone 4
	0006037953_126949: *See also* iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193:

Exhibit A

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

Exhibit A

'987 Patent Claim	Apple iPhone 4
interface.	Image: Apple Inc. In addition, the stainless steel band is disposed between the outside surface of the aluminosilicate glass screen (part of the housing that contains the receiver circuitry) and (1) the volume buttons and (2) the speakers (user interfaces). *See also* iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126951 (arrows and labels added):

Exhibit A

'987 Patent Claim	Apple iPhone 4
	See also iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949:

Exhibit A

'987 Patent Claim	Apple iPhone 4
	Stainless Steel Band Created from our own alloy, then forged to be five times stronger than standard steel, the CNC-machined band is the mounting point for all the components of iPhone 4. The band provides impressive structural rigidity and allows for its incredibly thin, refined design. It also functions as both iPhone 4 antennas.
14. A receiver according to claim 13 wherein the user interface further comprises at least one of the following: an acoustic, a visual and tactile interface.	Upon information and belief, the iPhone 4 receiver has visual (a touch-screen display), acoustic (speakers), and tactile (volume control buttons)user interfaces. *See, e.g.*, iPhone 4 Technical Specifications, (http://www.apple.com/iphone/specs.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126659:

Exhibit A

'987 Patent Claim	Apple iPhone 4
	See also iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949-50:
17. A receiver comprising:	Upon information and belief, Apple imports, manufactures, sells, offers to sell, and uses the Apple iPhone 4, which includes a receiver. For example, the iPhone 4 receives, among other things, telephone calls and text messages.
receiver circuitry;	Upon information and belief, the Apple iPhone 4 has receiver circuitry. For instance, the iPhone contains a logic board containing, among other things:

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Exhibit A

'987 Patent Claim	Apple iPhone 4
	- On the top of logic board: - 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 STM33DH 3-axis accelerometer - TriQuint TQM676091 338S0626 *See* iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127192-94 9 (arrows and labels added):

Exhibit A

'987 Patent Claim	Apple iPhone 4

Exhibit A

'987 Patent Claim	Apple iPhone 4

Exhibit A

'987 Patent Claim	Apple iPhone 4

Back of logic board with receiver circuitry disposed in a housing

 |

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Exhibit A

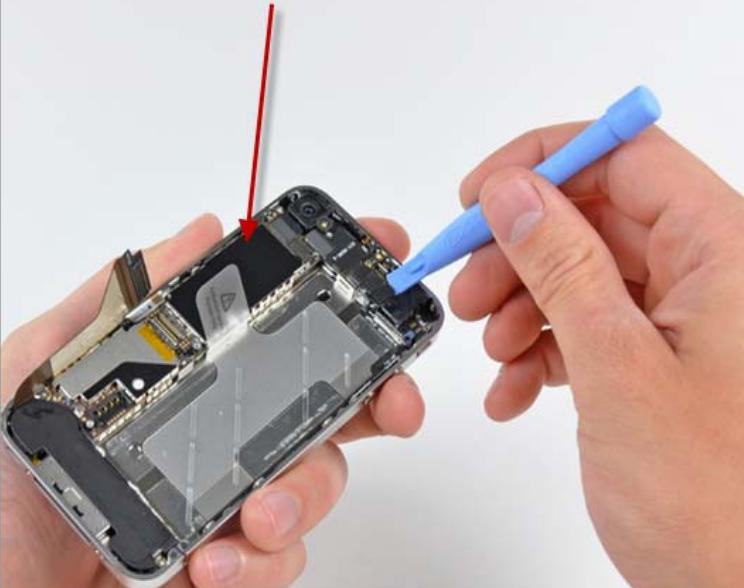| '987 Patent Claim	Apple iPhone 4
	On the top of logic board: • Skyworks SKY77542 Tx–Rx iPAC™ FEM for Dual-Band GSM/GPRS: 880–915 MHz and 1710–1785 MHz bands. • Skyworks SKY77541 GSM/GRPS Front End Module • STMicro STM33DH 3-axis accelerometer • TriQuint TQM676091 • 338S0626
a housing substantially enclosing the receiver circuitry;	Upon information and belief, the Apple iPhone 4 has a housing, comprised of at least the frame to the inside of the stainless steel band surrounding the iPhone and the non-conductive portion of the aluminosilicate glass screen, substantially enclosing the receiver circuitry. *See, e.g.*, iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1), accessed on May 13, 2011, MOTO-APPLE-0006037953_127208-10 (arrows and labels added):

Exhibit A

'987 Patent Claim	Apple iPhone 4

Exhibit A

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

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Exhibit A

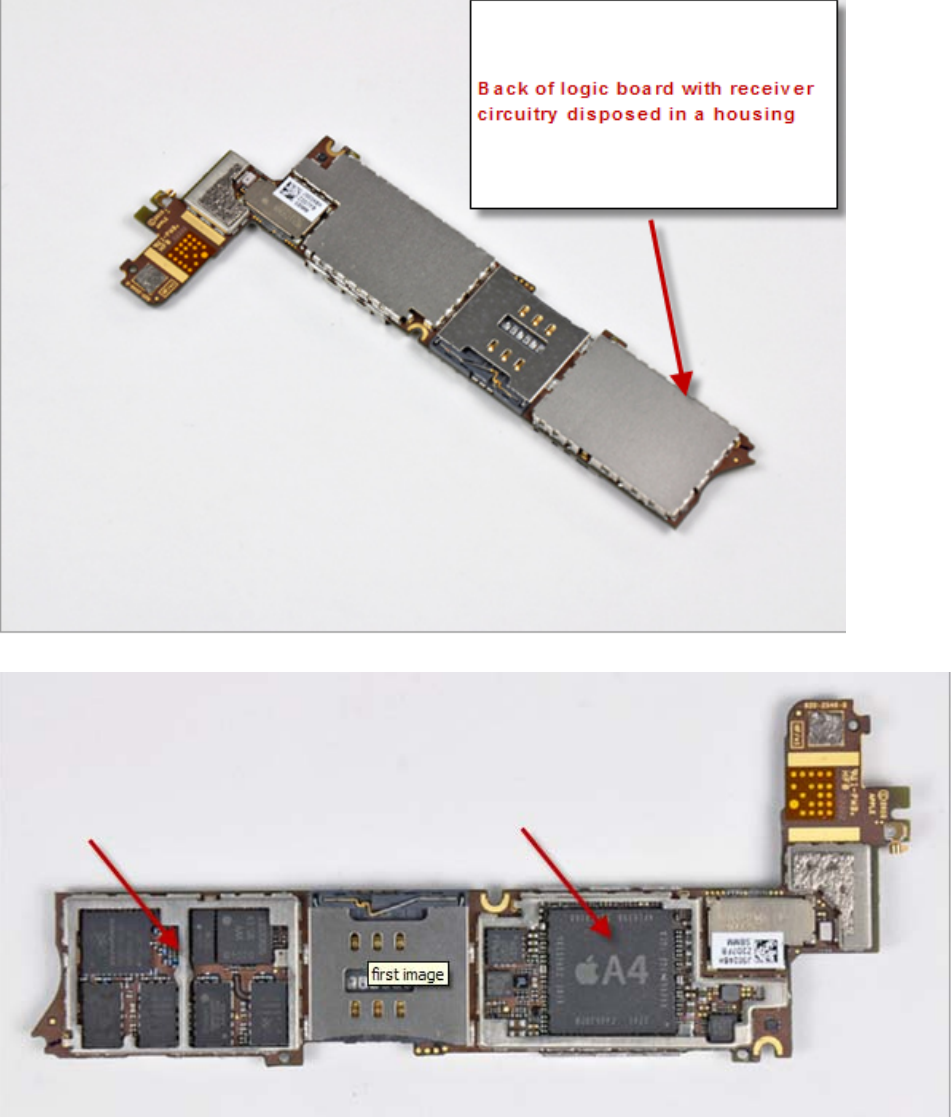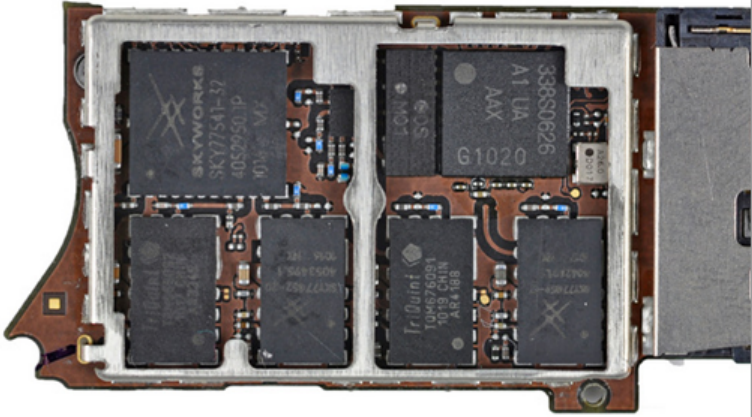| '987 Patent Claim	Apple iPhone 4
in the housing and at least partially covering the receiver circuitry, formed of an electrically conductive, electromagnetic wave-absorbing material for absorbing electromagnetic energy radiated by or towards the receiver circuitry;	electrically conductive, electromagnetic wave-absorbing material for absorbing electromagnetic energy radiated by or towards the receiver circuitry. *See, e.g.*, iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193-94 (arrows, labels, and highlighting added):

Exhibit A

'987 Patent Claim	Apple iPhone 4
	 Step 15 • With the EMI shields off, we can get a look at what makes this beast roar. • Lurking deep within the phone, the A4 processor, manufactured by Samsung, is the centralized unit that provides the iPhone 4 with the much needed computing power. • Replacing the Samsung S5PC100 ARM A8 600 MHz CPU used in the 3GS, the new iPhone uses the ARM Cortex A8 core, much like its bigger sibling, the iPad. The iPad's A4 is clocked at 1 Ghz. • The new Samsung Wave S8500 smartphone uses the same Cortex A8 core! • Just to the left of the A4 package, the AGD1 is the new 3 axis gyroscope that we believe is designed and manufactured by ST Micro for Apple. The package marks on this device do not appear to be the currently available commercial part, L3G4200D. The commercial version of this gyroscope is yet to be released — Apple got first dibs on it.
an antenna coupled to the receiver circuitry, carried on an outside, nonconductive surface of the housing and disposed outside the electromagnetic shield; and	Upon information and belief, both Apple iPhone 4 antennas are coupled to the receiver circuitry, and the stainless steel band portion of the antennas is carried on an outside, nonconductive surface of the housing, including at least the non-conductive portion of the aluminosilicate glass screen *See e.g.,* iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126953 (arrows and labels added):

Exhibit A

'987 Patent Claim	Apple iPhone 4
	Multi-Touch With its large Multi-Touch display and innovative software, iPhone lets you control everything using just your fingers. How does it work? A panel laminated on the glass senses your touch using electrical fields. It can register multiple touches at once to support advanced gestures such as pinch to zoom, two-finger tap, and more. The panel then transmits the information to the Retina display below it. Electrically Conductive Panel Non-Conductive Aluminosilicate Glass
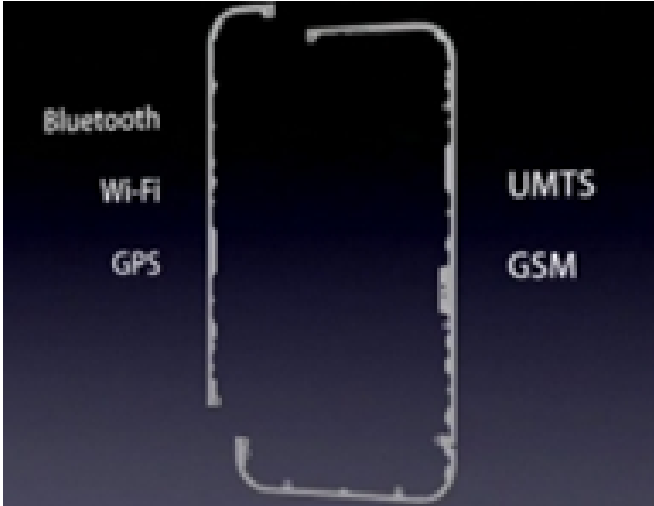
Exhibit A

'987 Patent Claim	Apple iPhone 4
	See also iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/1), accessed on May 13, 2011, MOTO-APPLE-0006037953_127209-10:

'987 Patent Claim	Apple iPhone 4
	Moreover, at least the stainless steel band portion of the antennas are disposed outside of the electromagnetic shield. *See, e.g.*, iPhone Teardown, (http://www.ifixit.com/Teardown/iPhone-4-Teardown/3130/2), accessed on May 13, 2011, MOTO-APPLE-0006037953_127193: *See, e.g.*, iPhone Design, (http://www.apple.com/iphone/design/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126949:

Exhibit A

'987 Patent Claim	Apple iPhone 4
	See, e.g., Image of iPhone 4 Antenna, (http://fortunebrainstormtech.files.wordpress.com/2010/06/iphone-4-antennas.jpg), accessed on May 13, 2011, MOTO-APPLE-0006037953_127191: Bluetooth Wi-Fi UMTS GPS GSM Image: Apple Inc.
a substantially planar and detachable cover, attached to the outside, nonconductive surface of the housing, for concealing the antenna between	Upon information and belief, Apple manufactures, imports, sells, offers to sell, and uses the iPhone 4 "bumper." The iPhone 4 bumper is a substantially planar and detachable cover. The iPhone 4 bumper is designed to be attached to the outside, non-conductive portion of the aluminosilicate glass screen (part of the housing) that covers the front of the iPhone 4. The iPhone 4 bumper conceals the stainless steel band portion of the antennas between the bumper and the outside, nonconductive surface of the housing (the non-conductive portion of the aluminosilicate glass display) such that the antenna is unnoticeable to a user of the receiver. Apple instructs its customers to attach the iPhone 4 bumper to the outside, nonconductive portion of the

Exhibit A

'987 Patent Claim	Apple iPhone 4
the cover and the outside, nonconductive surface of the housing such that the antenna is unnoticeable to a user of the receiver.	aluminosilicate glass display, for concealing the antennas between the bumper and the outside, nonconductive portion of the aluminosilicate glass display. *See, e.g.*, Apple iPhone Bumper – Pink, (http://store.apple.com/us/product/APPLE_IPHONE_BUMPERS-104238?mco=MTM3NjU0NTk), accessed on May 9, 2011, MOTO-APPLE-0006037953_127202: "Fits all iPhone 4 models for both AT&T and Verizon." *See also id.*: Apple iPhone 4 Bumper - Pink The iPhone 4 bumper is designed specifically for the iPhone 4 and will not fit any other phone. *See, e.g,. id.* "Important note: iPhone 4 Bumpers are compatible only with iPhone 4. They will not work with any other iPhone model." There is no substantial non-infringing use for the iPhone 4 bumper.

Exhibit A

'987 Patent Claim	Apple iPhone 4
	See also Antennagate Article, (http://www.msnbc.msn.com/id/38263228/ns/technology_and_science-wireless/t/apple-gives-free-bumpers-all-iphone-owners/), accessed on May 12, 2011, MOTO-APPLE-0006037953_126955:

Exhibit A

'987 Patent Claim	Apple iPhone 4
	Apple CEO Steve Jobs talks about the Apple iPhone 4 at Apple headquarters in Cupertino, Calif., Friday, July 16, 2010. **By Wilson Rothman** msnbc.com updated 7/16/2010 1:51:53 PM ET Share | Print | Font: A A + − Today, as expected, Steve Jobs announced that Apple would offer free rubber "bumpers" to anyone who bought an iPhone 4 in order to fix the problem caused by the antenna's design flaw. However, Jobs did not promise a hardware fix which would alleviate the problem without marring the phone's aesthetic. "We're not perfect," Jobs told reporters. "Phones aren't perfect either," adding, "but we want to make all of our users happy."

Exhibit B

UNITED STATES PATENT NO. 5,754,119

PRELIMINARY INFRINGEMENT CONTENTIONS[1]

Accused Apple Products:[2] MobileMe, Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4G, Apple iPad with 3G, Apple iPad 2 with 3G, and Apple iPod Touch.

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
1. A method of synchronizing message information among a plurality of transceivers comprising the steps of:	Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim, has actively induced users to perform such steps, and has contributed to such use by selling the accused products and providing directions for their use. Apple's MobileMe service with an Apple iPhone practice a method of synchronizing message information among a plurality of transceivers:

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[1] Motorola Mobility's investigation is ongoing and discovery and claim construction are not yet complete. 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 Mobility reserves the right to supplement this list of Accused Apple Products.

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

Exhibit B

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.

See also iPhone User Guide for iPhone 0S 3.1 Software, at MOTO-APPLE-0006037953_126971: |

Exhibit B

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

Exhibit B

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

Exhibit B

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	November 5, 2008 **What Is IMAP and Why Do We Use It?** There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts. The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home. With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.
transmitting by a wireless messaging infrastructure a first message having a first status;	Upon information and belief, MobileMe transmits by a wireless messaging structure a first message having a first status. For example, this first message could be an email (a first message) that has a status of the email being "Unread" (a first status). This first message could also be a calendar event, or a contact information. iPhone User Guide for iOS 4.2 and 4.3 Software, "Checking and Reading Email," MOTO-APPLE-0006037953_126750: "When you open a mailbox, Mail retrieves and displays the most recent messages, and shows the number of unread messages at the top of the screen. Unread messages have a

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Exhibit B

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	blue dot next to them . . . . If you organize messages by thread, related messages appear as a single entry in the mailbox. Message threads have a number next to the right arrow, showing the number of messages in the thread. A blue dot indicates that one or more messages in the thread are unread." *See* MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188:

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

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	indicative of the email's status of "Deleted" (the second status):

Push email

When you join MobileMe, you get a me.com email account that's always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you're notified the instant they arrive. MobileMe constantly checks for new messages, so you don't have to. And when you use MobileMe, you'll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That's because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.

The MobileMe Mail Beta offers even more great email features. Learn more ▸

See MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.

See also What is IMAP and Why Do We Use It, (http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:

Exhibit B

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
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in the wireless messaging infrastructure, receiving the second message, and responsive to receiving the second message, transmitting a third message indicative of the second status; and	Upon information and belief, MobileMe's wireless messaging infrastructure) receives the second message, and responsive to the second message, transmits a third message indicative of the the second status. For example, where the first message was an email, MobileMe's communications server (the wireless messaging infrastructure) receives the second message, and responsive to the second message, transmits a third message indicative of the email's status of "Unread" or "Deleted" (the second status).

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'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
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'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	Always up to date. As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You're notified as soon as it arrives, so you don't have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date. *See also* iPhone User Guide for iPhone 0S 3.1 Software, at MOTO-APPLE-0006037953_126971: **Setting Up Accounts** MobileMe and Microsoft Exchange provide not only email, but contact and calendar information that can be synced to iPhone automatically, over the air. MobileMe can also sync your bookmarks on iPhone with Safari on a Mac, or with Safari or Microsoft Internet Explorer on a PC. You set up MobileMe, Exchange, and other email accounts directly on iPhone. *See also* MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:

Exhibit B

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	See also What is IMAP and Why Do We Use It, (http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:

Exhibit B

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in at least one other transceiver of the plurality of transceivers, receiving the third message, and responsive to receiving the third message, changing the first status of the first message to the second status.	Upon information and belief, at least one other Apple iPhone receives the third message, and responsive to receiving the third message, changes the first status of the first message to the second status. For example, where the first message was an email, the first status of the email changes from "Unread" to "Read" or "Deleted" (the second status):

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

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'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe. *See also* Exhibit MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187: *See also* What is IMAP and Why Do We Use It, (http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html), accessed

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'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	on May 5, 2011, MOTO-APPLE-0006037953_126657: November 5, 2008 **What Is IMAP and Why Do We Use It?** There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts. The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home. With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.
2. The method according to claim 1 wherein the first status is an unread status and the second status is includes read, deleted, or protected status.	Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim, has actively induced users to perform such steps, and has contributed to such use by selling the accused products and providing directions for their use. Apple's MobileMe service with an Apple iPhone practice a method according to claim 1 wherein the first status is an unread status and

'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
	the second status is includes read, deleted, or protected status. As discussed above in Claim 1, MobileMe will transmit to an Apple iPhone an email that has a first status of "Unread." When a user of an Apple iPhone selects or deletes a message in the Mail.App of iOS, the email's status changes to a second status of "Read" or "Deleted."*See* Claim 1 contentions above.
5. A method of synchronizing a status of a plurality of transceivers comprising the steps of:	Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim, has actively induced users to perform such steps, and has contributed to such use by selling the accused products and providing directions for their use. Apple's MobileMe service with an Apple iPhone practice a method of synchronizing message information among a plurality of transceivers. *See* Claim 1 contentions above.
in a first transceiver, changing the status of the first transceiver from a first status to a second status as a result of an input from a user, and transmitting a first message indicative of the second status;	Upon information and belief, in a first transceiver connected to the MobileMe network the status of the first transceiver changes from a first status to a second status as a result of an input from a user, and transmits a first message indicative of the second status. For example, an Apple iPhone, (first transceiver) can, as a result of input from a user, can change the status of email, calendar, or contact information (first status) to reflect, *e.g.*, email deletions, new calendar appointments, and/or new contacts (second status) and transmit a first message indicative of the second status to the MobileMe communication server. *See* Claim 1 contentions above.
in a wireless messaging infrastructure, receiving the first message, and transmitting a second message indicative of the second status; and	Upon information and belief, MobileMe's wireless messaging infrastructure, receives the first message, and transmits a second message indicative of the second status. To continue the above example, the MobileMe communication server (the wireless messaging infrastructure) receives the first message transmitted by an Apple iPhone and transmits a second message to a second Apple iPhone that is , indicative of the second status, *e.g.*, any email deletions, new calendar appointments, and/or new contacts (second status). *See* Claim 1 contentions above.

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'119 Patent Claim	Representative Apple Product: Apple MobileMe communicating with an iPhone[3]
in a second transceiver, receiving the second message, and changing a status of the second transceiver to the second status in response thereto.	Upon information and belief, a second transceiver connected to the MobileMe network receives the second message, and changes a status of the second transceiver to the second status in response thereto. To continue the above example, a second Apple iPhone receives the second message transmitted by the MobileMe communication server, and in response thereto, changes the status of, *e.g.*, any email, calendar, or contact information to reflect any email deletions, new calendar appointments, and/or new contacts (second status). *See* Claim 1 contentions above.

Exhibit C

UNITED STATES PATENT NO. 5,958,006

PRELIMINARY INFRINGEMENT CONTENTIONS[1]

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

'006 Patent Claim	Representative Apple Products: Apple Phone communicating over MobileMe ; Apple Computer communicating over MobileMe[3]
12. A method of communicating data between a first data processing device and a third data processing device via a second data	Upon information and belief, an Apple Phone in the course of normal use with MobileMe and an Apple Computer in the course of normal use with MobileMe perform each and every step of this claim. Additionally, a user of an Apple Phone or an Apple Computer will performs each and every step of this claim in the course of such use. Furthermore, Apple performs each and every step of this claim, actively induces users to perform such steps, and contributes to such use by selling Apple Phones and Apple Computers for use with MobileMe and

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[1] Motorola Mobility's investigation is ongoing and discovery and claim construction are not yet complete. 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 preliminary infringement analysis for the MobileMe service communicating with Apple's accused products. In this claim chart, "Apple Phone" refers to Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4G, 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 4G, 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..

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'006 Patent Claim	Representative Apple Products: Apple Phone communicating over MobileMe ; Apple Computer communicating over MobileMe[3]
processing device, comprising:	providing directions for such use. Upon information and belief, Apple Phones and Apple Computers perform a method of communicating data between a first data processing device (MobileMe host server) and a third data processing device (Apple Phone) via a second processing device (MobileMe communication server). MobileMe Features, (http://www.apple.com/mobileme/features/), accessed May 13, 2011, MOTO-APPLE-0006037953_127187.

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'006 Patent Claim	Representative Apple Products: Apple Phone communicating over MobileMe ; Apple Computer communicating over MobileMe[3]
	See What is Mac OS X – Mail, iCal, Address Book, (http://www.apple.com/macosx/what-is-macosx/mail-ical-address-book.html), accessed May 14, 2011, MOTO-APPLE-0006037953_127173-74: *See also* iPhone Features, (http://www.apple.com/iphone/features/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126650-50:

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

Exhibit C

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

(a) at the second data processing device, controlling communication of qualifying and non-qualifying data units from the first data processing device to the third data processing device including	Upon information and belief, the MobileMe communication server (second data processing device) controls communication of non-HTML images (qualifying data units) and HTML images (non-qualifying data units) from the MobileMe host server (first data processing device) to an Apple Phone or an Apple Computer (third data processing device).
	
	 See Screenshot of raw data from a MobileMe indicating MobileMe is a communication server, taken on May 10, 2011, MOTO-APPLE-0006037953_127175 (highlighting added):
	
	 <pre>Return-path:
	<return_smverp_.1232082537.1088744.DATABASEID.1169284.929109887.158307._smverp_.XXXXXXX=mac.com@ab.mm.ticketmaster.com>
	Received: from smtpin138.mac.com ([10.150.68.138]) by ms02034.mac.com (Oracle Communications Messaging Exchange Server 7u4-21.01
	64bit (built Feb 16 2011)) with ESMTP id <0LL0008HF8ZC8P80@ms02034.mac.com>
	for XXXXXXXXX@mac.com; Wed, 11 May 2011 00:21:12 +0000 (GMT)
	Original-recipient: rfc822;XXXXXXXXX
	Received: from sms1-els204-94.mm.ticketmaster.com ([209.104.36.94]) by smtpin138.mac.com (Sun Java(tm) System Messaging Server 7u3-
	16.01 64bit (built May 20 2010)) with ESMTP id <0LL000B1F8Z21W20@smtpin138.mac.com> for XXXXXXX@mac.com (ORCPT XXXXXXXXX@mac.com);
	Tue, 10 May 2011 17:21:12 -0700 (PDT)
	X-Proofpoint-Virus-Version: vendor=fsecure engine=2.50.10432:5.2.15,1.0.148,0.0.0000
	definitions=2011-05-10_13:2011-05-11,2011-05-10,1970-01-01 signatures=0
	X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 spamscore=0 ipscore=0 suspectscore=62 phishscore=0 bulkscore=100
	adultscore=0 classifier=spam adjust=0 reason=mlx engine=6.0.2-1012030000
	definitions=main-1105100173
	Received: from sms1.mm.els204.clisys.tmcs ([10.75.20.63])
	        by sms1-els204-94.mm.ticketmaster.com (StrongMail Enterprise 3.2.3(3.00.316)) ; Tue, 10 May 2011 17:21:11 -0700
	X-VirtualServer: Default, sms1-els204-94.mm.ticketmaster.com, 10.75.20.62
	X-VirtualServerGroup: Default
	X-Destination-ID: XXXXXXXXX@mac.com
	X-MailingID: 1232082537::1088744::DATABASEID::1169284::929109887::158307
	X-SMHeaderMap: mid="X-MailingID"
	X-SMFBL: aW5mb19maWVuZEBtYWMuY29t
	X-Mailer: StrongMail Enterprise 3.2.3(3.00.316)
	Content-type: multipart/alternative;
	boundary="----=_NextPart_001_AEA6_74B0DC51.19495CFF"
	MIME-version: 1.0
	Message-id: <1232082537.158307@BOWERYBALLROOM.COM>
	Subject:
	=?UTF-8?B?U291bmRnYXJkZW4sIEJvbiBJdmVyLCBCZW4gSGFycGVyICYgbW9yZSBvbiBzYWxlIHRoaXMgd2Vlay4=?=
	Date: Tue, 10 May 2011 17:21:11 -0700
	To: XXXXXXXXX@mac.com
	From: =?UTF-8?B?VGhlIEJvd2VyeSBQcmVzZW50cw==?= <INFO@BOWERYBALLROOM.COM></pre>

receiving individually	Upon information and belief, the MobileMe communication server receives individually filtered data units

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Exhibit C

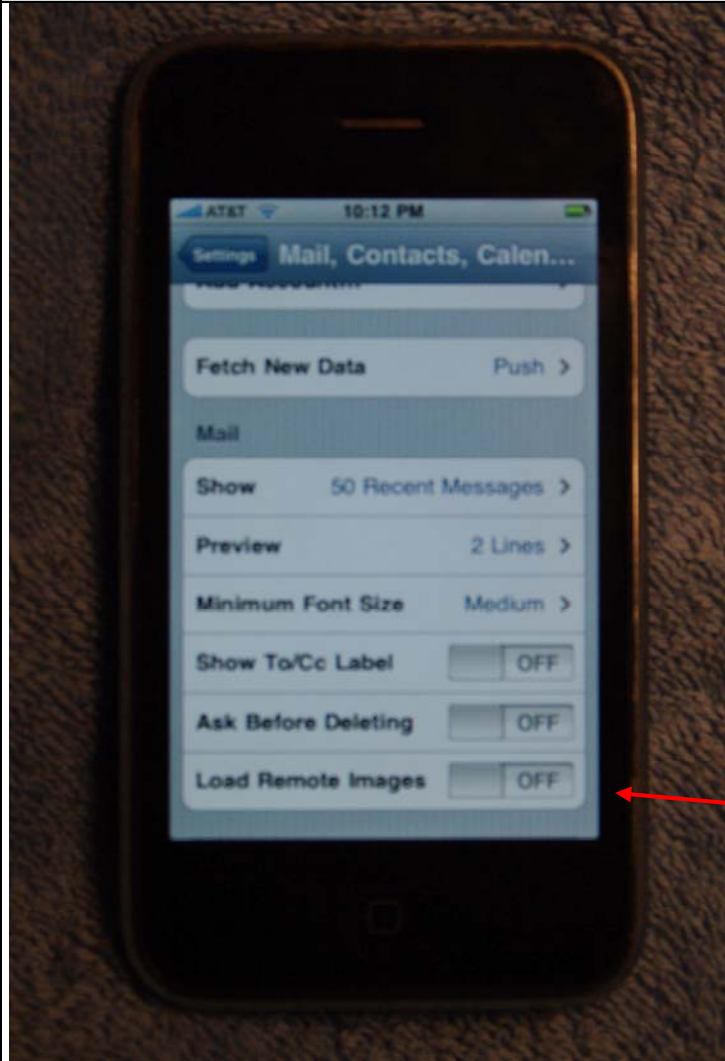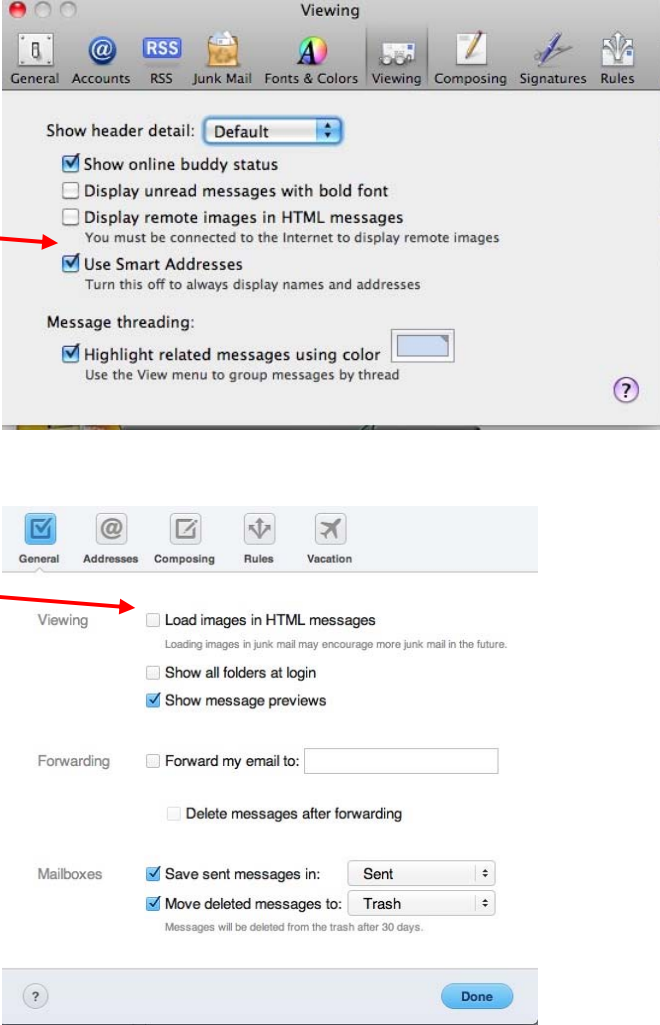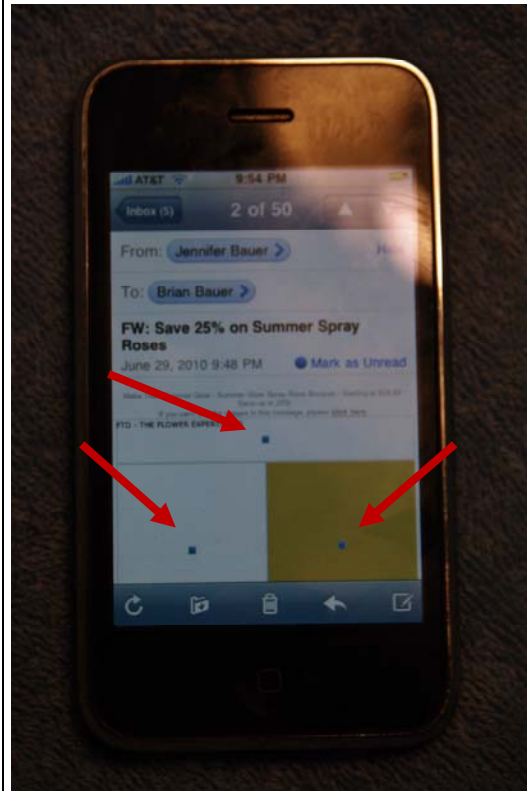| '006 Patent Claim	Representative Apple Products: Apple Phone communicating over MobileMe ; Apple Computer communicating over MobileMe[3]
filtered data units from the first data processing device based on at least one user-definable filter parameters to identify whether a data unit is a qualifying or non-qualifying data unit,	from the MobileMe host server (the first data processing device) based on at least whether the data unit is a HTML image (a user-definable filter parameter) to identify whether a data unit is a qualifying or non-qualifying data unit. When used with an Apple Phone, this is performed by the MobileMe communication server when the "load remote images" setting is set to "off" in the Apple Phone Settings App:

Exhibit C

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

Exhibit C

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

Exhibit C

'006 Patent Claim	Representative Apple Products: Apple Phone communicating over MobileMe ; Apple Computer communicating over MobileMe[3]
	Screenshots of Apple Computer showing options to display images in HTML messages, taken May 12, 2011, MOTO-APPLE-0006037953_127177-78 (arrows added).

Exhibit C

'006 Patent Claim	Representative Apple Products: Apple Phone communicating over MobileMe ; Apple Computer communicating over MobileMe[3]
	See also MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204: ■ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ◉ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images.
wherein for qualifying data units, an identifying information part and an additional part is received and for non-qualifying data units, the identifying information part without the additional part is received,	Upon information and belief, for non-HTML images (qualifying data units), the date, subject, sender, etc. (identifying information parts) and the non-HTML images in the email content (the additional part) is received by MobileMe's communication server. For HTML images (non-qualifying data units), the date, subject, sender, etc. (the identifying information parts) without the HTML images (the additional part) are received: ■ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ◉ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images. MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204.

Exhibit C

and providing the third data processing device with the identifying information part and the additional part for qualifying data units and providing the third data processing device with the identifying information part without the additional part for non-qualifying data units.	Upon information and belief, MobileMe's communication server provides an Apple Phone and/or an Apple Computer (the third data processing device) with the date, subject, sender, etc. (the identifying information part) and the non-HTML images in the email content (the additional part) for qualifying data units and provides the Apple Phone and/or an Apple Computer with the identifying information part without the HTML images (the additional part) for non-qualifying data units. *See* MobileMe Help, (http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm6b1a0b80.html), accessed May 5, 2011, MOTO-APPLE-0006037953_127204: ■ To control whether or not HTML images are loaded automatically when a message is viewed, choose Preferences from the Action menu ⦿ in the toolbar at the top of the window, click General, select the checkbox next to "Load images in HTML messages," and then click Done. When "Load images in HTML messages" checkbox isn't selected, messages that contain HTML images appear with a Load Images button you can click to see the images. *See also* Picture of the iPhone showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Phone, taken May 12, 2011, MOTO-APPLE-0006037953_127179 (arrows added); Picture of an Apple Computer showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Computer via the Mail.App in OS X, taken May 12, 2011, MOTO-APPLE-0006037953_127180 (arrows added); Picture of an Apple Computer showing identifying information (including location in the email) about the .html that was not sent from the MobileMe service to an Apple Computer via the MobileMe web application, taken May 12, 2011, MOTO-APPLE-0006037953_127181 (arrows added):

Exhibit C

	Apple iPhone Apple Computer via Mail.App

Exhibit C

Apple Computer via MobileMe web application

| 26. A controller of a communication unit adapted for requesting data over a wireless communication channel from a further data processing host via a communication server, the controller comprising: | Upon information and belief, Apple sells, offers for sale, manufactures, imports, and uses Apple Phones and Apple Computers, and Apple induces its customers to purchase and use Apple Phones and Apple Computers, which contain a controller and are communication units adapted for requesting data over a wireless communication channel from a further data processing host via a communication server, *e.g.*, the MobileMe communication server.

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

Exhibit C

```
Return-path:
<return_smverp_.1232082537.1088744.DATABASEID.1169284.929109887.158307._smverp_.XXXXXXX=mac.com@ab.mm.ticketmaster.com>
Received: from smtpin138.mac.com ([10.150.68.138]) by ms02034.mac.com (Oracle Communications Messaging Exchange Server 7u4-21.01
64bit (built Feb 16 2011)) with ESMTP id <0LL0008HF8ZC8P80@ms02034.mac.com>
for XXXXXXXXX@mac.com; Wed, 11 May 2011 00:21:12 +0000 (GMT)
Original-recipient: rfc822;XXXXXXXXX
Received: from sms1-els204-94.mm.ticketmaster.com ([209.104.36.94]) by smtpin138.mac.com (Sun Java(tm) System Messaging Server 7u3-
16.01 64bit (built May 20 2010)) with ESMTP id <0LL000B1F8Z21W20@smtpin138.mac.com> for XXXXXXX@mac.com (ORCPT XXXXXXXXX@mac.com);
Tue, 10 May 2011 17:21:12 -0700 (PDT)
X-Proofpoint-Virus-Version: vendor=fsecure engine=2.50.10432:5.2.15,1.0.148,0.0.0000
definitions=2011-05-10_13:2011-05-11,2011-05-10,1970-01-01 signatures=0
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 spamscore=0 ipscore=0 suspectscore=62 phishscore=0 bulkscore=100
adultscore=0 classifier=spam adjust=0 reason=mlx engine=6.0.2-1012030000
definitions=main-1105100173
Received: from sms1.mm.els204.clisys.tmcs ([10.75.20.63])
       by sms1-els204-94.mm.ticketmaster.com (StrongMail Enterprise 3.2.3(3.00.316)) ; Tue, 10 May 2011 17:21:11 -0700
X-VirtualServer: Default, sms1-els204-94.mm.ticketmaster.com, 10.75.20.62
X-VirtualServerGroup: Default
X-Destination-ID: XXXXXXXXX@mac.com
X-MailingID: 1232082537::1088744::DATABASEID::1169284::929109887::158307
X-SMHeaderMap: mid="X-MailingID"
X-SMFBL: aW5mb19maWVuZEBtYWMuY29t
X-Mailer: StrongMail Enterprise 3.2.3(3.00.316)
Content-type: multipart/alternative;
boundary="-----=_NextPart_001_AEA6_74B0DC51.19495CFF"
MIME-version: 1.0
Message-id: <1232082537.158307@BOWERYBALLROOM.COM>
Subject:
=?UTF-8?B?U291bmRnYXJkZW4sIEJvbiBJdmVyLCBCZW4gSGFyGVyICYgbW9yZSBvbiBzYWxlIHRoaXNgd2Vlay4=?=
Date: Tue, 10 May 2011 17:21:11 -0700
To: XXXXXXXXX@mac.com
From: =?UTF-8?B?VGhlIEJvd2VyeSBQcmVzZW50cw==?= <INFO@BOWERYBALLROOM.COM>
```

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

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

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Exhibit C

<table>
<tr>
<td></td>
<td>

November 5, 2008

What Is IMAP and Why Do We Use It?

There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.

The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.

With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.

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

</td>
</tr>
</table>

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Exhibit C

Mail, Contacts, and Calendar

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.

Push email, push contacts, push calendar.

Watch the QuickTour ▶

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

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Exhibit C

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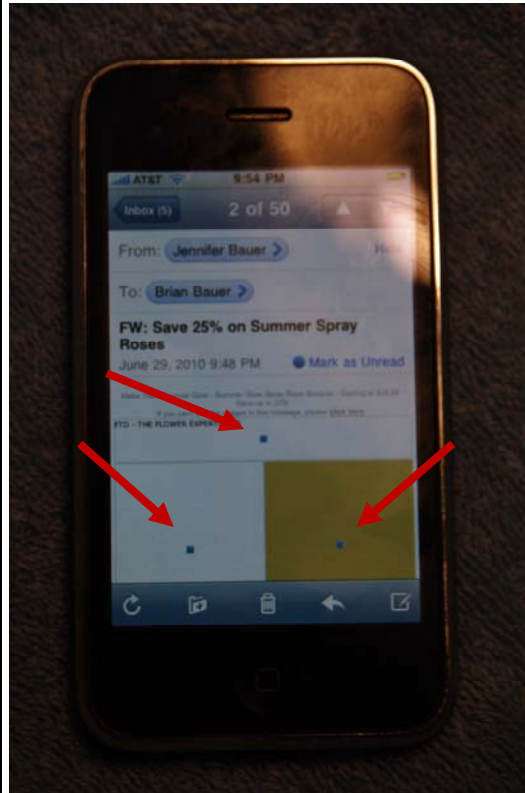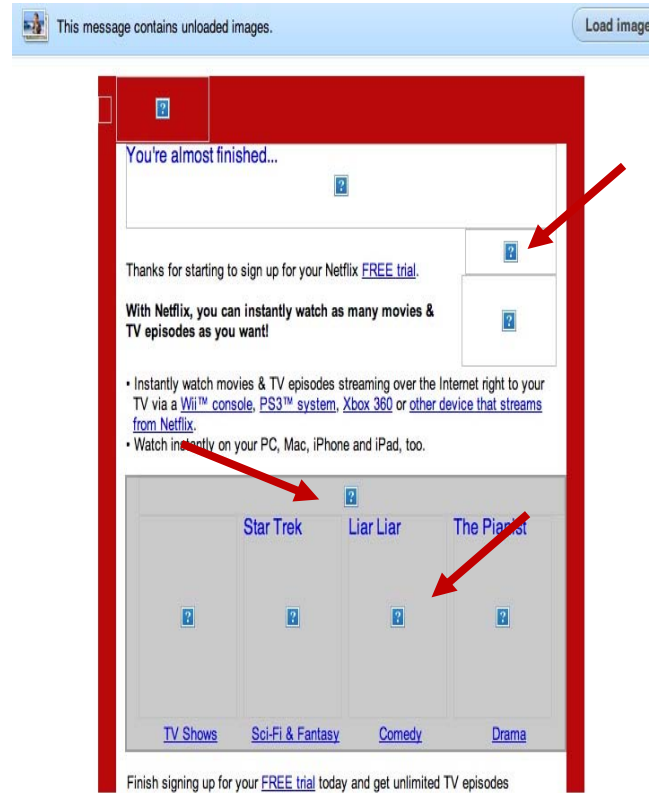
Exhibit C

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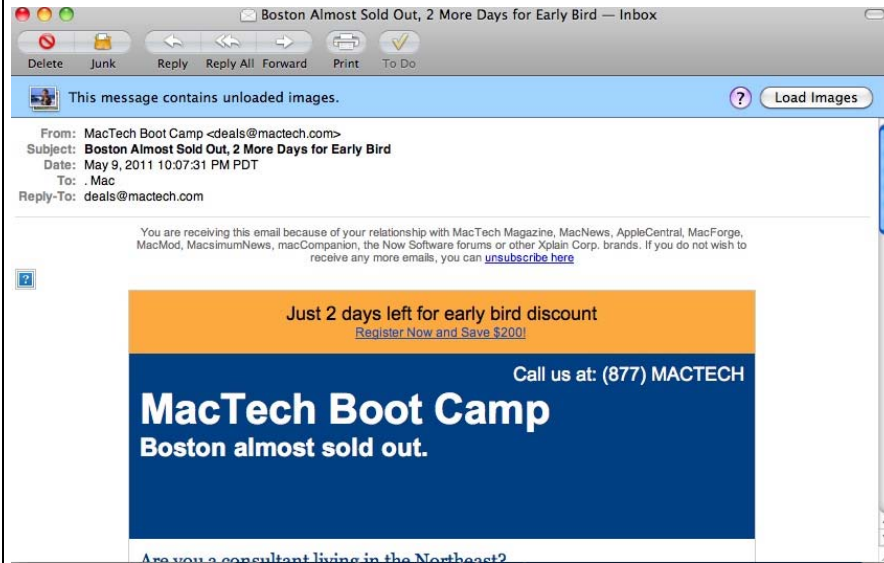
See also Photo of iPhone showing HTML images after being downloaded from the MobileMe infrastructure, taken June 29, 2010, MOTO-APPLE-0006037953_127182:

Exhibit C
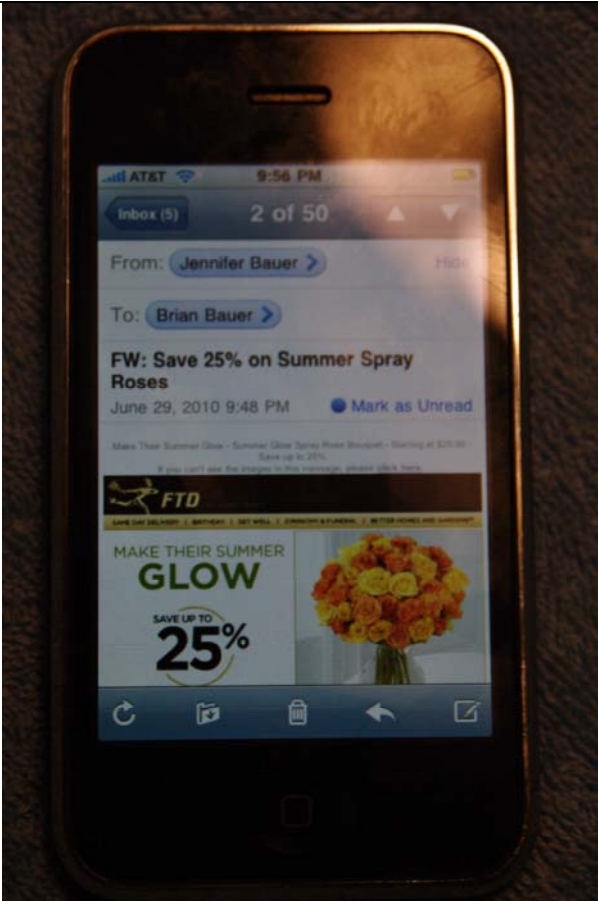
wherein said data units are individually filtered prior to reception at the communication unit, based upon user definable filter parameters.	Upon information and belief, said HTML images (data units) are individually filtered prior to reception at the Apple Phone and/or Apple Computer (the communication unit), based upon whether the end user has chosen to not receive HTML images (the user definable filter parameters). Upon information and belief, for an Apple Phone, this is performed when the "load remote images" setting is set to "off" in the Apple Phone Settings App:
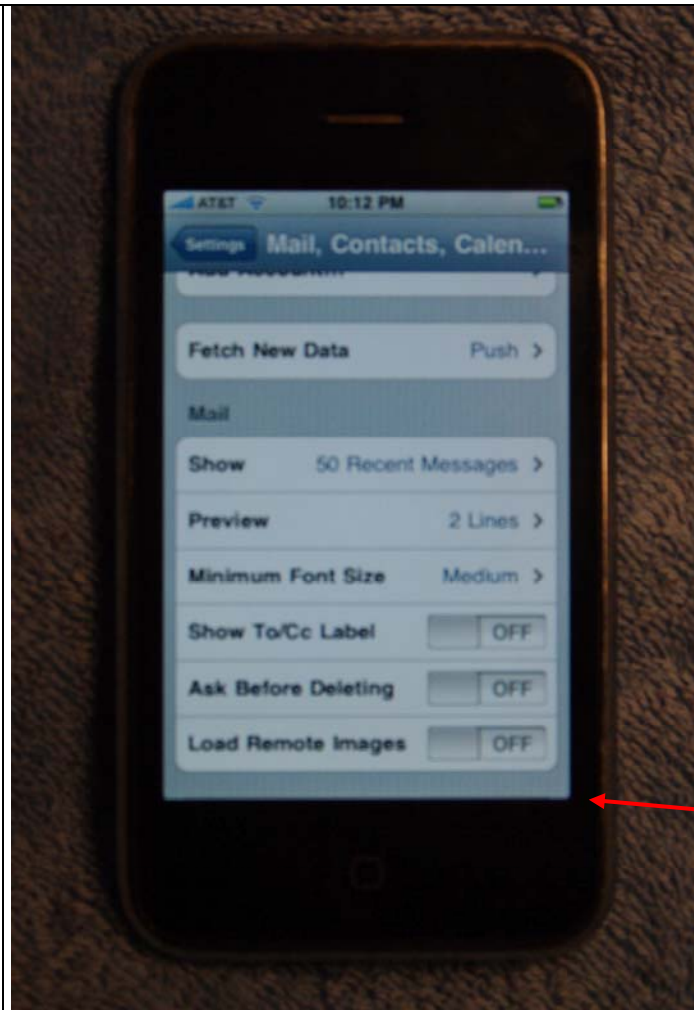
Exhibit C

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

Upon information and belief, on an Apple computer, this is performed when (1) the "Display remote images in HTML messages" setting is not selected in the Mail.App of Apple's OS X operating system or (2) the

Exhibit C

| | "Load images in HTML messages" setting is not selected in the Preferences section of the MobileMe web application:
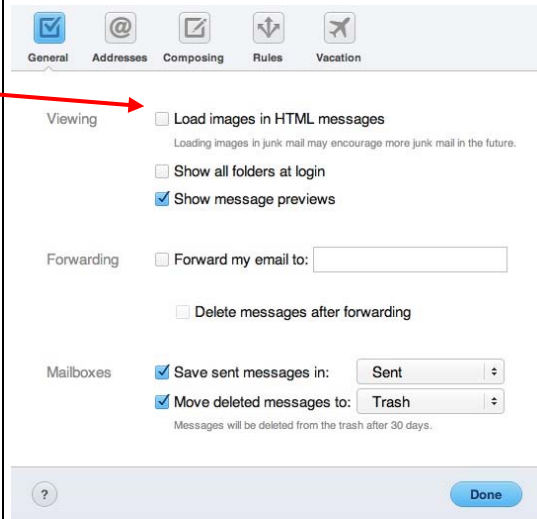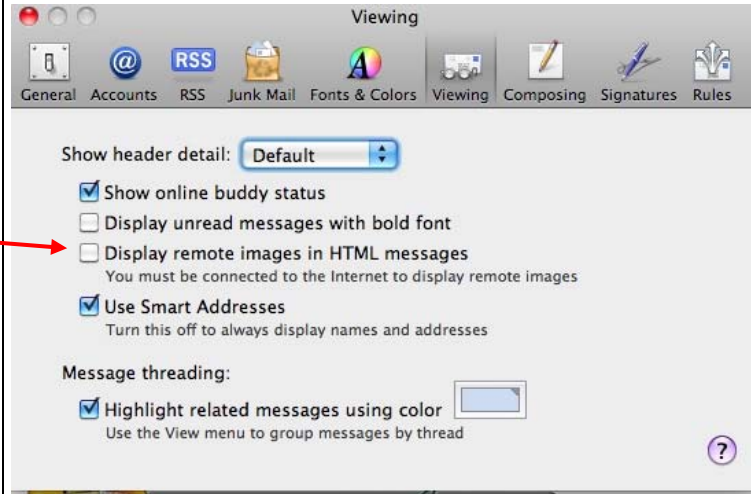
See Screenshots of Apple Computer showing options to display images in HTML messages, taken May 12, 2011, MOTO-APPLE-0006037953_127177-78 (arrows added). |

Exhibit C

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

UNITED STATES PATENT NO. 6,008,737

PRELIMINARY INFRINGEMENT CONTENTIONS[1]

Accused Apple Products:[2] Apple iPhone 3G, 3GS, and 4G , Apple iPad, Apple iPad with 3G, Apple iPad 2, Apple iPad 2 with 3G, Apple iPod Touch (collectively, "Apple Phones"), Apple MacBook, Apple MacBook Pro, Apple MacBook Air, Apple iMac, Apple Mac Mini, and Apple Mac Pro (collectively, "Apple Computers").

'737 Patent Claim	Accused Apple Products
9. A portable communication device in a communication system having a fixed portion, the portable communication device comprising:	Upon information and belief, Apple imports, manufactures, sells, offers to sell, and uses the Accused Apple Products, which area portable communication devices. Moreover, the Accused Apple Products operate in the normal course of use in a communication system having a fixed portion. *See, e.g.*, iPhone 4 Technical Specifications, (http://www.apple.com/iphone/specs.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126659:

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[1] Motorola Mobility's investigation is ongoing and discovery and claim construction are not yet complete. 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 Mobility reserves the right to supplement this list of Accused Apple Products.

Exhibit D

'737 Patent Claim	Accused Apple Products
	Size and weight[1] Height: **4.5** inches (115.2 mm) Width: **2.31** inches (58.6 mm) Depth: **0.37** inch (9.3 mm) Weight: **4.8** ounces (137 grams) 0.37 inch 9.3 mm 2.31 inches 58.6 mm 4.5 inches 115.2 mm **Cellular and wireless** ■ UMTS/HSDPA/HSUPA (850, 900, 1900, 2100 MHz) ■ GSM/EDGE (850, 900, 1800, 1900 MHz) ■ 802.11b/g/n Wi-Fi (802.11n 2.4GHz only) ■ Bluetooth 2.1 + EDR wireless technology *See also e.g.,* Apple iPad Technical Specifications, (www.apple.com/ipad/specs), accessed on April 12, 2011, MOTO-APPLE-0005383110_35376: Wireless and Cellular ■ Wi-Fi (802.11a/b/g/n) ■ Bluetooth 2.1 + EDR technology ■ Wi-Fi + 3G model: UMTS/HSDPA/HSUPA (850, 900, 1900, 2100 MHz); GSM/EDGE (850, 900, 1800, 1900 MHz) ■ Wi-Fi + 3G for Verizon model: CDMA EV–DO Rev. A (800, 1900 MHz) ■ Data only[a] ■ Wi-Fi (802.11a/b/g/n) ■ Bluetooth 2.1 + EDR technology Learn more about Wi-Fi + 3G ▶ *See also, e.g.*, 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:
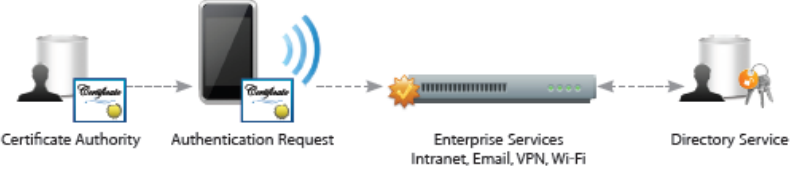
'737 Patent Claim	Accused Apple Products
a processor;	Upon information and belief, the Apple Phones contain a variety of different processors, such a an Apple A4 processor, and Apple Computers contain a variety of different processors, such as the 2.4GHz Intel Core 2 Duo processor. *See, e.g.*, (http://www.apple.com/channel/iphone/iphone-4/best-buy/design.html), accessed May 12, 2011, MOTO-APPLE-0006037953_127201: *See also e.g.,* Apple iPad Technical Specifications, (www.apple.com/ipad/specs), accessed on April 12, 2011, MOTO-APPLE-0005383110_35376: *See also, e.g.*, 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_127248:

Exhibit D
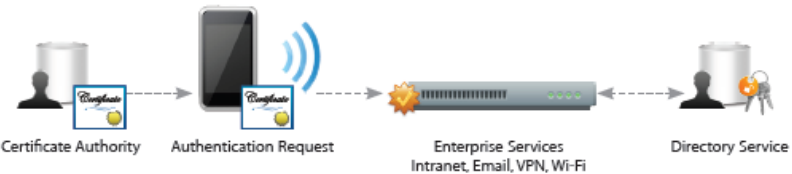
'737 Patent Claim	Accused Apple Products
	  MacBook Pro 15" Core 2 Duo **Model A1211** 2.16 or 2.33 GHz Core 2 Duo processor
an authorization element coupled to the processor for obtaining usage authorization for utilizing software in the portable communication device,	Upon information and belief, the Accused Apple Products contain an authorization element coupled to the processor for obtaining usage authorization for utilizing software: **Mandatory Code Signing** All iPhone applications must be signed. The applications provided with the device are signed by Apple. Third-party applications are signed by the developer using an Apple-issued certificate. This ensures that applications haven't been tampered with or altered. Additionally, runtime checks are made to ensure that an application hasn't become untrusted since it was last used. iPhone in Business: Security Overview, MOTO-APPLE-0006037953_126666. *See also* iPhone in Business: Digital Certificates, MOTO-APPLE-0006037953_126669: **Digital certificates** Digital certificates can be used to securely authenticate users to corporate services without the need for user names, passwords or soft tokens. On iPhone, certificate-based authentication is supported for access to Microsoft Exchange ActiveSync, VPN, and Wi-Fi networks. Certificate Authority Authentication Request Enterprise Services Intranet, Email, VPN, Wi-Fi Directory Service

'737 Patent Claim	Accused Apple Products
	See also id.: iPhone supports digital certificates, giving business users secure, streamlined access to corporate services. A digital certificate is composed of a public key, information about the user, and the certificate authority that issued the certificate. Digital certificates are a form of identification that enables streamlined authentication, data integrity, and encryption. On iPhone, certificates can be used in a variety of ways. Signing data with a digital certificate helps to ensure that information cannot be altered. Certificates can also be used to guarantee the identity of the author or "signer." Additionally, they can be used to encrypt configuration profiles and network communications to further protect confidential or private information. *See also* Distributing Enterprise Apps for iOS 4 Devices, (http://developer.apple.com/library/ios/#featuredarticles/FA_Wireless_Enterprise_App_Distribution/Introduction/Introduction.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126598: "**Certificate Validation**. The first time an application is opened on a device, the distribution certificate is validated by contacting Apple's OCSP server. Unless the certificate has been revoked, the app is allowed to run. Inability to contact or get a response from the OCSP server is not interpreted as a revocation. To verify the status, the device must be able to reach ocsp.apple.com. See 'Network Configuration Requirements.' The OCSP response is cached on the device for the period of time specified by the OCSP server; currently between 3 and 7 days. The validity of the certificate will not be checked again until the device has restarted and the cached response has expired. If a revocation is received at that time, the app will be prevented from running. Note that revoking a distribution certificate will invalidate all of the applications you have distributed. An app will not run if the distribution certificate has expired. Currently, distribution certificates are valid for one year. A few weeks before your certificate expires request a new distribution certificate from the Dev Center, use it create new distribution provisioning profiles, then recompile and distribute the updated apps to your users. See 'Providing Updated Apps.'" *See e.g.*, Communications with the Apple App store.
in which the authorization	Upon information and belief, the authorization element in the

Exhibit D

'737 Patent Claim	Accused Apple Products
element generates an external authorization request, and	Accused Apple Products generates an external authorization request. For example, the digital certificate (authorization element) is validated by contacting an external OCSP server (external authorization request) upon initial opening, and by a runtime check (external authorization request) at each time of use. *See* Distributing Enterprise Apps for iOS 4 Devices, (http://developer.apple.com/library/ios/#featuredarticles/FA_Wireless_Enterprise_App_Distribution/Introduction/Introduction.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126598: "**Certificate Validation**. The first time an application is opened on a device, the distribution certificate is validated by contacting Apple's OCSP server. Unless the certificate has been revoked, the app is allowed to run. Inability to contact or get a response from the OCSP server is not interpreted as a revocation. To verify the status, the device must be able to reach ocsp.apple.com. See 'Network Configuration Requirements.' The OCSP response is cached on the device for the period of time specified by the OCSP server; currently between 3 and 7 days. The validity of the certificate will not be checked again until the device has restarted and the cached response has expired. If a revocation is received at that time, the app will be prevented from running. Note that revoking a distribution certificate will invalidate all of the applications you have distributed. An app will not run if the distribution certificate has expired. Currently, distribution certificates are valid for one year. A few weeks before your certificate expires request a new distribution certificate from the Dev Center, use it create new distribution provisioning profiles, then recompile and distribute the updated apps to your users. See 'Providing Updated Apps.'" *See also* iPhone in Business: Security Overview, MOTO-APPLE-0006037953_126666:

'737 Patent Claim	Accused Apple Products
	Mandatory Code Signing All iPhone applications must be signed. The applications provided with the device are signed by Apple. Third-party applications are signed by the developer using an Apple-issued certificate. This ensures that applications haven't been tampered with or altered. Additionally, runtime checks are made to ensure that an application hasn't become untrusted since it was last used. *See also* iPhone in Business: Digital Certificates, MOTO-APPLE-0006037953_126669: **Digital certificates** Digital certificates can be used to securely authenticate users to corporate services without the need for user names, passwords or soft tokens. On iPhone, certificate-based authentication is supported for access to Microsoft Exchange ActiveSync, VPN, and Wi-Fi networks. Certificate Authority — Authentication Request — Enterprise Services Intranet, Email, VPN, Wi-Fi — Directory Service
in which the authorization element communicates with the fixed portion to obtain the usage authorization in response to the external authorization request, and	Upon information and belief, the authorization element in the Accused Apple Products communicates with the fixed portion to obtain the usage authorization in response to the external authorization request. For example, the digital certificate (authorization element) is validated by contacting an external OCSP server (communication to fixed portion to obtain usage authorization) upon initial opening, and by a runtime check (external authorization request) at each time of use. *See, e.g.*, Distributing Enterprise Apps for iOS 4 Devices, (http://developer.apple.com/library/ios/#featuredarticles/FA_Wireless_Enterprise_App_Distribution/Introduction/Introduction.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126598: "**Certificate Validation**. The first time an application is opened on a device, the distribution certificate is validated by contacting Apple's OCSP server. Unless the certificate has been revoked, the app is allowed to run. Inability to contact or get a response from the OCSP server is not interpreted as a revocation. To verify the status, the device must be able to reach ocsp.apple.com. See 'Network Configuration Requirements.'

'737 Patent Claim	Accused Apple Products
	The OCSP response is cached on the device for the period of time specified by the OCSP server; currently between 3 and 7 days. The validity of the certificate will not be checked again until the device has restarted and the cached response has expired. If a revocation is received at that time, the app will be prevented from running. Note that revoking a distribution certificate will invalidate all of the applications you have distributed. An app will not run if the distribution certificate has expired. Currently, distribution certificates are valid for one year. A few weeks before your certificate expires request a new distribution certificate from the Dev Center, use it create new distribution provisioning profiles, then recompile and distribute the updated apps to your users. See 'Providing Updated Apps.'" *See also* iPhone in Business: Security Overview, MOTO-APPLE-0006037953_126666: **Mandatory Code Signing** All iPhone applications must be signed. The applications provided with the device are signed by Apple. Third-party applications are signed by the developer using an Apple-issued certificate. This ensures that applications haven't been tampered with or altered. Additionally, runtime checks are made to ensure that an application hasn't become untrusted since it was last used. *See also* iPhone in Business: Digital Certificates, MOTO-APPLE-0006037953_126669: **Digital certificates** Digital certificates can be used to securely authenticate users to corporate services without the need for user names, passwords or soft tokens. On iPhone, certificate-based authentication is supported for access to Microsoft Exchange ActiveSync, VPN, and Wi-Fi networks. Certificate Authority — Authentication Request — Enterprise Services Intranet, Email, VPN, Wi-Fi — Directory Service
in which the external authorization request includes at least one of: an address identifying the	Upon information and belief, the external authorization request includes at least one of: an address identifying the portable communication device, a software name and a size of the software.

Exhibit D

'737 Patent Claim	Accused Apple Products
portable communication device, a software name and a size of the software; and	For example, an X.509 digital certificate for an iPhone 4 "enforces a trust policy referred to as the S/MIME policy, which specifies that in order to be trusted to verify a digitally signed email, a certificate must contain an email address that matches the address of the sender of the email." Security Concepts, (http://developer.apple.com/library/ios/#documentation/Security/Conceptual/Security_Overview/Concepts/Concepts.html), accessed on May 13, 2011, MOTO-APPLE-0006037953_126611. *See id.* at MOTO-APPLE-0006037953_126608: "A digital certificate is a collection of data used to verify the identity of the holder or sender of the certificate: For example, an X.509 certificate contains such information as: • Version • Serial number • Certificate issuer • Certificate holder • Validity period (the certificate is not valid before or after this period) • Attributes, known as certificate extension, that contain additional information such as allowable uses for this certificate • Digital signature from the certification authority to ensure that the certificate has not been altered and to indicate the identity of the issuer • Public key of the owner of the certificate • Message digest algorithm used to create the signature." *See also* Distributing Enterprise Apps for iOS 4 Devices, (http://developer.apple.com/library/ios/#featuredarticles/FA_Wireless_Enterprise_App_Distribution/Introduction/Introduction.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126598: "**Certificate Validation**. The first time an application is opened on a device, the distribution certificate is validated by contacting Apple's OCSP server. Unless the certificate has been revoked, the app is allowed to run. Inability to contact or get a response from the OCSP server is not interpreted as a revocation. To verify the status, the device must be able to reach ocsp.apple.com. See 'Network

'737 Patent Claim	Accused Apple Products
	Configuration Requirements.'
	The OCSP response is cached on the device for the period of time specified by the OCSP server; currently between 3 and 7 days. The validity of the certificate will not be checked again until the device has restarted and the cached response has expired. If a revocation is received at that time, the app will be prevented from running. Note that revoking a distribution certificate will invalidate all of the applications you have distributed.
	An app will not run if the distribution certificate has expired. Currently, distribution certificates are valid for one year. A few weeks before your certificate expires request a new distribution certificate from the Dev Center, use it create new distribution provisioning profiles, then recompile and distribute the updated apps to your users. See 'Providing Updated Apps.'"
second authorization element coupled to the processor for allowing utilization of the software, in response to usage authorization being obtained from the fixed portion.	Upon information and belief, the Accused Apple Products contain a second authorization element coupled to the processor for allowing utilization of the software, in response to an authorization being obtained from the fixed portion.
	For example, the iPhone 4 software application is allowed to run (second authorization element) once the digital certificate is authorized (usage authorization obtained from fixed portion.
	See, e.g., Distributing Enterprise Apps for iOS 4 Devices, (http://developer.apple.com/library/ios/#featuredarticles/FA_Wireless_Enterprise_App_Distribution/Introduction/Introduction.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126598:
	"**Certificate Validation**. The first time an application is opened on a device, the distribution certificate is validated by contacting Apple's OCSP server. Unless the certificate has been revoked, the app is allowed to run. Inability to contact or get a response from the OCSP server is not interpreted as a revocation. To verify the status, the device must be able to reach ocsp.apple.com. See 'Network Configuration Requirements.'
	The OCSP response is cached on the device for the period of time specified by the OCSP server; currently between 3 and 7 days. The validity of the certificate will not be

'737 Patent Claim	Accused Apple Products
	checked again until the device has restarted and the cached response has expired. If a revocation is received at that time, the app will be prevented from running. Note that revoking a distribution certificate will invalidate all of the applications you have distributed. An app will not run if the distribution certificate has expired. Currently, distribution certificates are valid for one year. A few weeks before your certificate expires request a new distribution certificate from the Dev Center, use it create new distribution provisioning profiles, then recompile and distribute the updated apps to your users. See 'Providing Updated Apps.'"

UNITED STATES PATENT NO. 6,101,531

PRELIMINARY INFRINGEMENT CONTENTIONS[1]

Accused Apple Products:[2] Apple iPhone 3G S, Apple iPhone 3G, Apple iPhone 4G, 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 .

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
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 iPhones and Apple Computers perform each and every step of this claim in the course of normal use with MobileMe. Additionally, a user of an Apple iPhone 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 and has actively induced users to perform such steps, and has contributed to such use by selling Apple Phones, Apple Computers, and MobileMe and by providing directions for their use.

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[1] Motorola Mobility's investigation is ongoing and discovery and claim construction are not yet complete. 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 Mobility reserves the right to supplement this list of Accused Apple Products.

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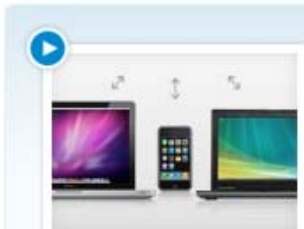
Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
communication server, the method comprising, at the communication server:	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 mail server) via a communication server (a MobileMe communication server): November 5, 2008 **What Is IMAP and Why Do We Use It?** There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts. The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home. With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions. What is IMAP and Why Do We Use It, (http://www.apple.com/mobileme/news/2008/11/what-is-

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	imap-and-why-do-we-use-it.html), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657. *See* MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:
filtering data units based on a first set of user-selected criteria to produce filtered	Upon information and belief, MobileMe filters data units based on a first set of user-selected criteria to produce filtered data units. 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

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]

data units;	units):
	
	■ **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.
	
	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.

communicating the filtered data units to the client communication unit;	Upon information and belief, MobileMe 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):

| '531 Patent Claim | Representative Apple Products: Apple MobileMe communicating with an Apple Phone |
	Apple MobileMe communicating with an Apple Computer[3]
	MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187. *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:

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	■ **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.
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;	Upon information and belief, MobileMe 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. 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 receives any and all of these user-selected criteria previously prepared at the Apple Phone, which are, when completed, sent to MobileMe communication server:

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	  Photo of Apple iPhone showing option to load remote images, taken June 29, 2010, MOTO-APPLE 0006037953_127176 (arrow added). 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:

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	Helping Mail identify junk mail 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. 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. **To identify junk messages:** ▪ 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. 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. *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: ▪ **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.

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone
	Apple MobileMe communicating with an Apple Computer[3]
	See also How MobilMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207: **Forward spam to spam@me.com** 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?". *See also* MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-006037953_127187:

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Exhibit E

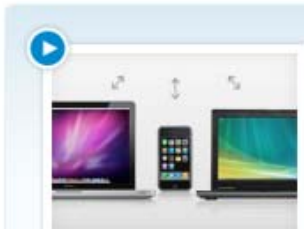| '531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
filtering subsequent data units based on the second set of the plurality of user-selected criteria to create subsequent filtered data units; and	Upon information and belief, MobileMe 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. When used with an Apple Phone, MobileMe 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.

Exhibit E

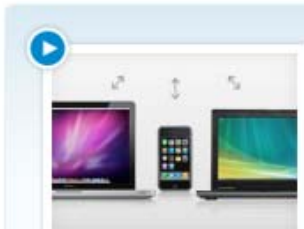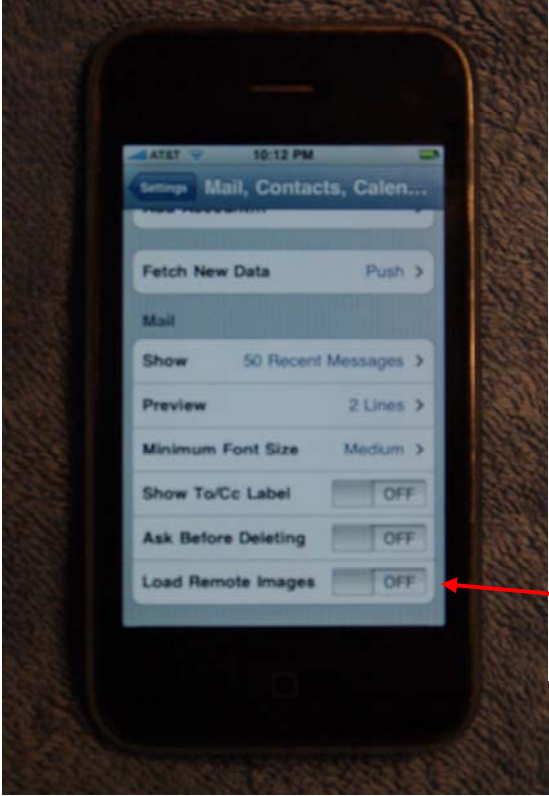| '531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	When used with an Apple Computer, MobileMe will filter subsequent email messages (subsequent data units) based on the new junk mail criteria (the second set of the plurality of user-selected criteria) to create subsequent filtered emails: **Helping Mail identify junk mail** 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. 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. **To identify junk messages:** ▪ 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. 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. *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:

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	■ **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. *See also* How MobilMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207: **Forward spam to spam@me.com** 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?".
communicating the subsequent filtered data units to the client communication unit.	Upon information and belief, MobileMe communicates the subsequent filtered data units to the client communication unit. For example, MobileMe 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) Likewise, MobileMe will allow messages that pass through the new junk mail filter(the subsequent filtered data units) to the Apple Computer (client communication unit):

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'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	  MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.
2. The method according to claim 1 further comprising truncating a subsequent filtered data unit if the subsequent filtered data unit	Upon information and belief, Apple iPhones perform each and every step of this claim in the course of normal use with MobileMe. Additionally, a user of an Apple iPhone 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 and by providing directions for their use.

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
exceeds a first filter size.	
	Upon information and belief, Apple iPhones will truncate subsequent data units if the subsequent filtered data unit exceeds a second filter size.
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:	Upon information and belief, Apple iPhones and Apple Computers perform each and every step of this claim in the course of normal use with MobileMe. Additionally, a user of an Apple iPhone 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 and has actively induced users to perform such steps, and has contributed to such use by selling Apple Phones, Apple Computers, and MobileMe and by providing directions for their use. 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 mail server) via a communication server (a MobileMe communication server):

Exhibit E

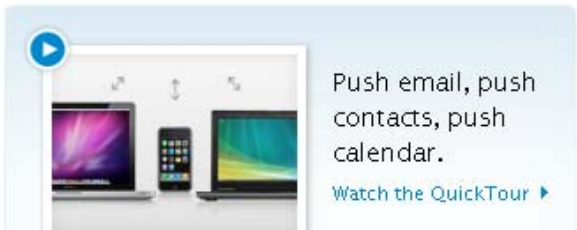| ‘531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone
	Apple MobileMe communicating with an Apple Computer[3]
	November 5, 2008 **What Is IMAP and Why Do We Use It?** There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts. The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing––a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home. With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions. 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. *See* MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:

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Exhibit E

| '531 Patent Claim | Representative Apple Products: Apple MobileMe communicating with an Apple Phone |
	Apple MobileMe communicating with an Apple Computer[3]
filtering data units, at the communication server, based on a first set of user-selected criteria to produce filtered data units;	Upon information and belief, MobileMe filters data units based on a first set of user-selected criteria to produce filtered data units. 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):

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Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	■ **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. 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.
communicating, at the communication server, the filtered data units to the client communication unit;	Upon information and belief, MobileMe 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):

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone
	Apple MobileMe communicating with an Apple Computer[3]
	MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187. *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:

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	■ **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.
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;	The user of an Apple Phone can prepare a second set of a plurality of filter criteria, *e.g.*, a user 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. When the user has completed preparing the second set of a plurality of filter criteria, it is communicated to MobileMe communication server in a virtual session.

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	  Photo of Apple iPhone showing option to load remote images, taken June 29, 2010, MOTO-APPLE 0006037953_127176 (arrow added). 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:

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	  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. *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:

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'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone
	Apple MobileMe communicating with an Apple Computer[3]
	See also How MobilMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207: **Forward spam to spam@me.com** 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?". *See also* MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-006037953_127187:

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
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	Upon information and belief, MobileMe 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. When used with an Apple Phone, MobileMe 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.

Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone
	Apple MobileMe communicating with an Apple Computer[3]
	When used with an Apple Computer, MobileMe will filter subsequent email messages (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: **Helping Mail identify junk mail** 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. 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. To identify junk messages: ▪ 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. 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. *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:

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| '531 Patent Claim | Representative Apple Products: Apple MobileMe communicating with an Apple Phone |
	Apple MobileMe communicating with an Apple Computer[3]
	■ **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. *See also* How MobilMe filters spam messages, (http://support.apple.com/kb/HT1073), accessed on May 13, 2011, MOTO-APPLE-0006037953_127207: **Forward spam to spam@me.com** 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?".
communicating, at the communication server, the subsequent filtered data units to the client communication unit.	Upon information and belief, MobileMe communicates the subsequent filtered data units to the client communication unit. For example, MobileMe 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) Likewise, MobileMe will allow messages that pass through the new junk mail filter(the subsequent filtered data units) to the Apple Computer (client communication unit):

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Exhibit E

'531 Patent Claim	Representative Apple Products: Apple MobileMe communicating with an Apple Phone Apple MobileMe communicating with an Apple Computer[3]
	  MobileMe Features, (http://www.apple.com/mobileme/features/), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.

UNITED STATES PATENT NO. 6,377,161

PRELIMINARY INFRINGEMENT CONTENTIONS[1]

Accused Apple Products:[2] Apple iPhone 3G, 3GS, and 4G ("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"), and MobileMe.

'161 Patent Claim	Accused Apple Products
1. A method in a wireless messaging system for facilitating an exchange of address information between first and second portable messaging units, the method comprising the steps of:	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. In a wireless messaging system, the Accused Apple Products facilitate the exchange of address information between first and second portable messaging units. For example, (1) Using a wireless messaging system (*e.g.*, MobileMe, 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, *e.g.*, an Apple iPhone (first portable messaging unit) and, *e.g.*, another Apple iPhone (second portable messaging unit).

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[1]   Motorola Mobility's investigation is ongoing and discovery and claim construction are not yet complete. 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.

'161 Patent Claim	Accused Apple Products
	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. **Mail** iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688. *See also id.* at MOTO-APPLE-0006037953_126751: **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." *See also*, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:

Exhibit F

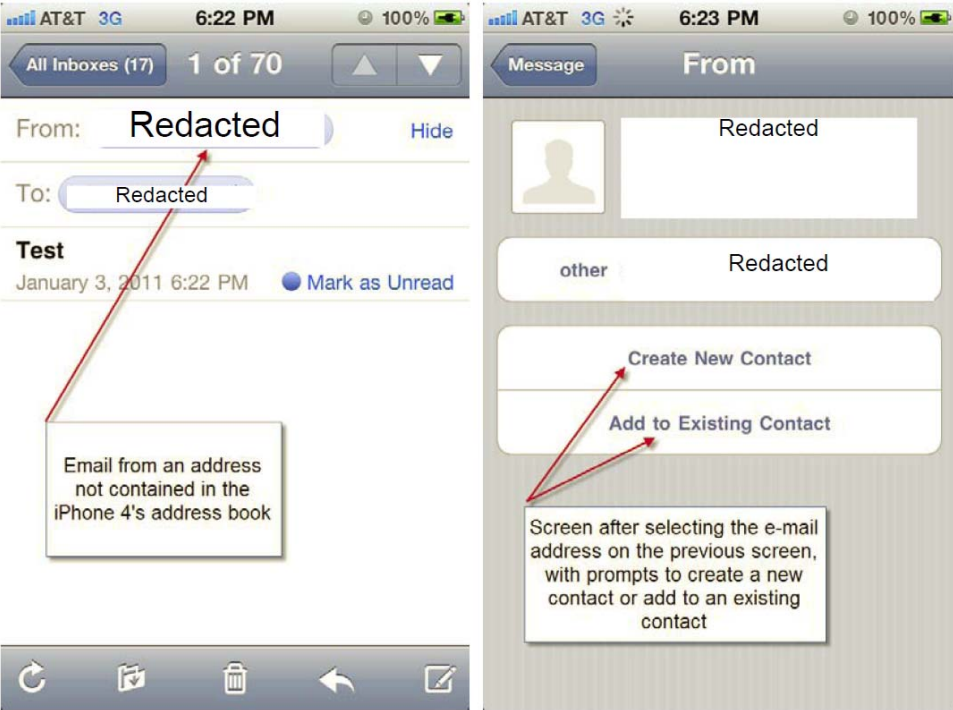| '161 Patent Claim	Accused Apple Products
	Amazing by all accounts. Add your work account, your fun account, and any other email account to iPad. Keep them in separate inboxes and easily switch between them. Or put all your accounts in one inbox and see all your messages at once. Mail works with the most popular providers, including MobileMe, Google Gmail, Microsoft Exchange, Yahoo! Mail, Hotmail, and AOL — along with most industry-standard IMAP and POP email systems. (2) In addition, over a cellular telephone network (wireless messaging system, Apple iPhones facilitate the exchange of text message address information (address information) between, *e.g.*, an Apple iPhone (first portable messaging unit) and, *e.g.*, another Apple iPhone (second portable messaging unit)):

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Exhibit F

'161 Patent Claim	Accused Apple Products
	## Sending and Receiving Messages *WARNING:* For important information about driving safely, see the *Important Product Information Guide* at www.apple.com/support/manuals/iphone. 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. *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. The Messages icon on the Home screen shows the number of unread messages you have. Number of unread messages 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. iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126780.
sending the address information from the first portable messaging unit to the second portable messaging unit through the wireless messaging system;	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, (1) Through a wireless messaging system, a first Accused Apple Product (first portable messaging unit) can send email address information (address information) to, *e.g.*, a second Accused Apple Product (second portable messaging unit) :

Exhibit F

'161 Patent Claim	Accused Apple Products
	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. iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688. *See also*, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Amazing by all accounts. 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. (2) In addition, through a cellular telephone network, a first Apple iPhone (first portable messaging unit) can send text address information (address information) to, *e.g.*, a second Apple iPhone (second portable messaging unit) .

'161 Patent Claim	Accused Apple Products
	## Sending and Receiving Messages *WARNING:* For important information about driving safely, see the *Important Product Information Guide* at www.apple.com/support/manuals/iphone. 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. *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. The Messages icon on the Home screen shows the number of unread messages you have. Number of unread messages 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. iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.
receiving the address information by the second portable messaging unit;	Upon information and belief, the email or text address information is received by the second Accused Apple Product. For example, (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):

Exhibit F

'161 Patent Claim	Accused Apple Products
	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. iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688. *See also,* (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, at MOTO-APPLE-0006037953_126647:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Amazing by all accounts. 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. (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):

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Exhibit F

'161 Patent Claim	Accused Apple Products
	  iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.
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	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, (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

'161 Patent Claim	Accused Apple Products
unit; and	email address and either create a new contact or add it to an 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." *Id.* at MOTO-APPLE-0006037953_126751. - 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:

Exhibit F

'161 Patent Claim	Accused Apple Products
Screenshot of Apple Computer Screen, taken May 9, 2011, MOTO-APPLE-0006037953_126641.

(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: |

Exhibit F

'161 Patent Claim	Accused Apple Products
	  See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).

Exhibit F
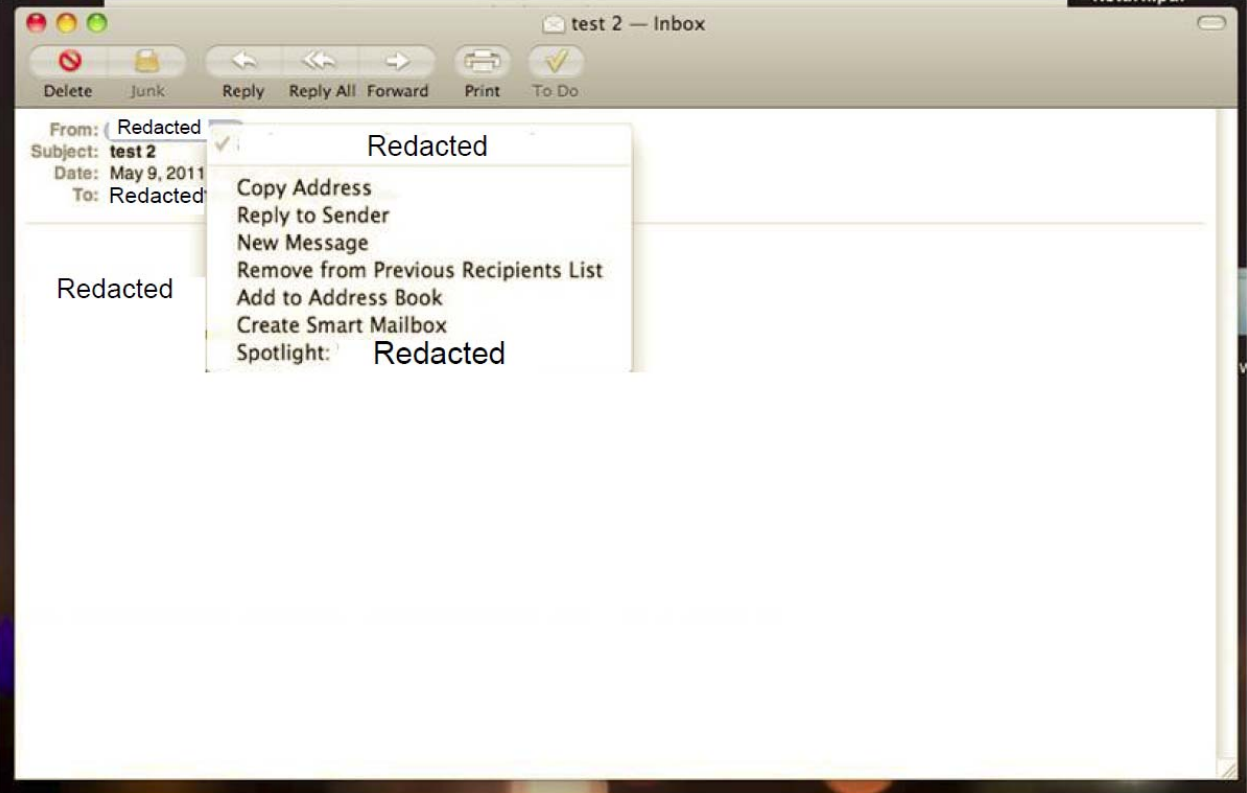
'161 Patent Claim	Accused Apple Products
processing the address information, by the second portable messaging unit, in a predetermined manner selected in response to the checking step.	Upon information and belief, as the second portable messaging unit, all Accused Apple Products process the address information in a predetermined manner selected in response to whether information identical to the second address information is stored in the address book. For example, (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: Where email address information is not in the Second iPhone's Contacts

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Exhibit F

'161 Patent Claim	Accused Apple Products
	See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126645-46 (arrows and labels added). *See also* iPhone User Guide for iOS 4.2 and 4.3 Software at MOTO-APPLE-0006037953_126751:

'161 Patent Claim	Accused Apple Products
	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." - 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:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Apple Computer Screenshots, taken May 9, 2011, MOTO-APPLE-0006037953_126641. (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:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Where text address information is not in the Second iPhone's Contacts *See* iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).

'161 Patent Claim	Accused Apple Products
	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: *See* iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126644 (arrows and labels added). *See also* 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:

Exhibit F

'161 Patent Claim	Accused Apple Products
2. The method of claim 1, wherein the processing step comprises the step of storing the address information in the	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
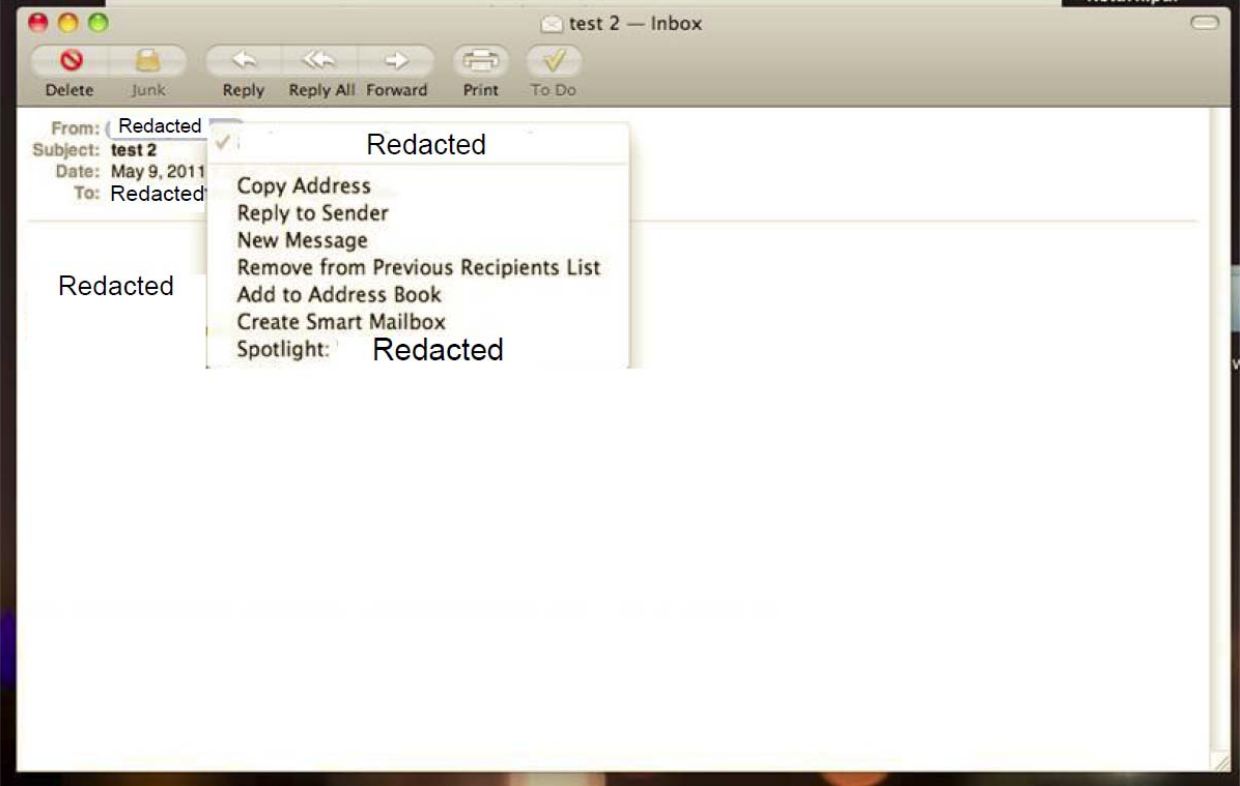
'161 Patent Claim	Accused Apple Products
address book, when no information identical to the address information is stored in the address book.	the address book, when no information identical to the address information is stored in the address book. *See* Claim 1 contentions above. *See, e.g.,* iPhone 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:
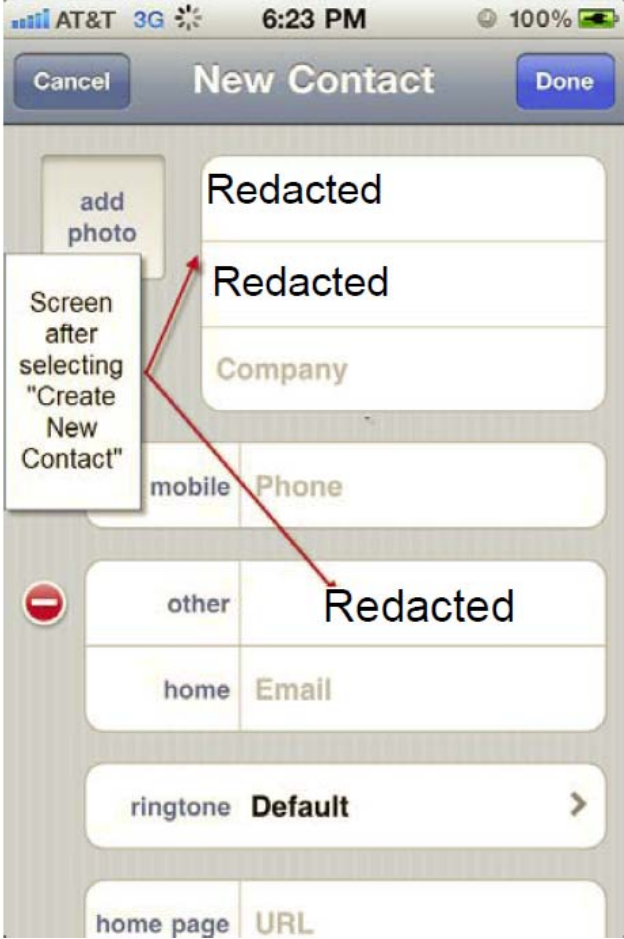
Exhibit F
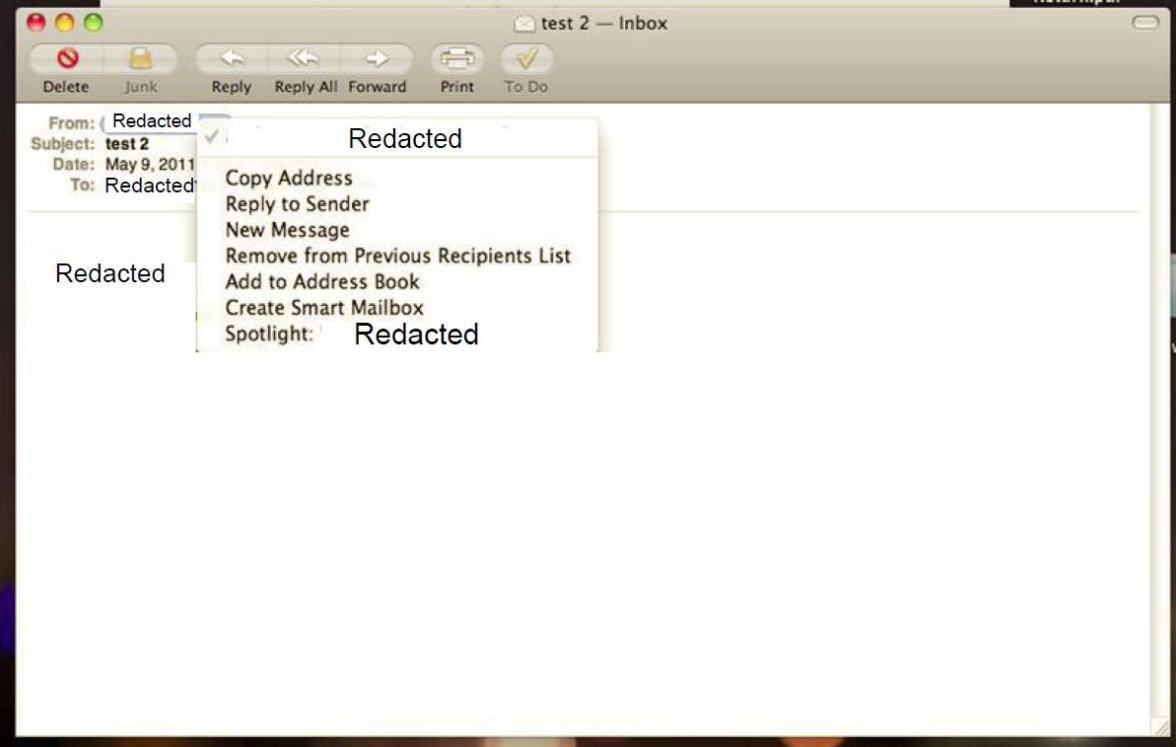
'161 Patent Claim	Accused Apple Products
3. The method of claim 1, wherein the processing step comprises the steps of: generating a prompt inquiring whether a user of the second portable messaging unit wishes to store the address information, when no information identical to the address information is stored in the address book; and	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). *See* Claim 1 contentions above. *See, e.g.,*

'161 Patent Claim	Accused Apple Products
	  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:

Exhibit F

'161 Patent Claim	Accused Apple Products
storing the address information in the address book, in response to an affirmative response to the prompt by the user.	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. *See* Claim 1 contentions above. *See, e.g.*,

'161 Patent Claim	Accused Apple Products
	  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:

Exhibit F

'161 Patent Claim	Accused Apple Products
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	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. For example, the address information received can include a cellular telephone number, a user name, or an email address. *See* Claim 1 contentions above.
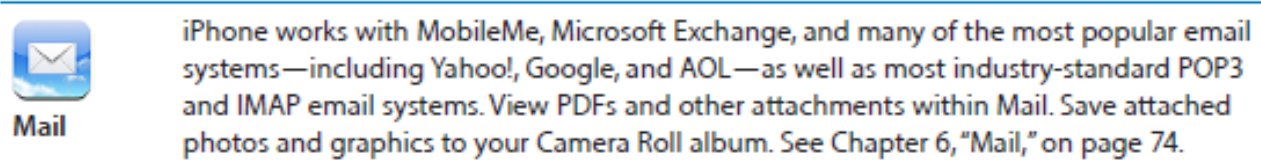
'161 Patent Claim	Accused Apple Products
wherein the checking step comprises the step of checking whether the unique user identifier is stored in the address book.	Upon information and belief, where an Apple iPhone, Apple iPad, or iPod is the second portable messaging unit, that device will check whether 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). *See* Claim 1 contentions above.
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.	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. 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). *See* Claim 1 contentions above.
12. A portable messaging unit in a wireless messaging system for facilitating an exchange of address information, the portable messaging unit comprising	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. For example: (1) In a wireless messaging system (*e.g.*, MobileMe, Exchange, Gmail, Yahoo, AOL, etc.), any Accused Apple Product facilitates an exchange of email address information (address information): 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.

Exhibit F

'161 Patent Claim	Accused Apple Products
	See iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126688. *See also id.* at MOTO-APPLE-0006037953_126751: 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." *See also*, (http://www.apple.com/ipad/built-in-apps/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126647:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Amazing by all accounts. 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. *See also*, (http://www.apple.com/why-mac/better-hardware/), accessed on May 14, 2011, MOTO-APPLE-0006037953_126649:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Connect fast. Connect easy. 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. (2) In a cellular telephone network (wireless messaging system), Apple iPhones facilitate the exchange of text address information (address information):

Exhibit F

'161 Patent Claim	Accused Apple Products
	  iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.
a transmitter for sending address information to another portable messaging unit through the wireless messaging system	Upon information and belief, all Accused Apple Products have a transmitter for sending address information to another portable messaging unit (*e.g.*, another Accused Apple Product) through the wireless messaging system. For example: 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, *e.g.*, an Apple iPhone through a cellular telephone network (wireless messaging system):

Exhibit F

'161 Patent Claim	Accused Apple Products
	Cellular and wireless ■ 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 iPhone 4 Technical Specifications, (http://www.apple.com/iphone/specs.html), accessed on May 12, 2011, MOTO-APPLE-0006037953_126659. *See also* iPhone User Guide for iOS 4.2 and 4.3 Software, MOTO-APPLE-0006037953_126780.

'161 Patent Claim	Accused Apple Products
	### Sending and Receiving Messages *WARNING:* For important information about driving safely, see the *Important Product Information Guide* at www.apple.com/support/manuals/iphone. 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. *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. The Messages icon on the Home screen shows the number of unread messages you have. Number of unread messages 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. 2) All Accused Apple Products contain wireless hardware (transmitter) allowing it to send, *e.g.*, email address information to another portable messaging unit (*e.g.*, another Accused Apple Product) though a wireless messaging system (., MobileMe, Exchange, Gmail, Yahoo, AOL, etc.):

Exhibit F

'161 Patent Claim	Accused Apple Products

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

See iPad Features, (http://www.apple.com/ipad/features/), accessed on May 14, 2011, MOTO-APPLE-0006037953_127244-45: |

Exhibit F

'161 Patent Claim	Accused Apple Products
	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:

Exhibit F

'161 Patent Claim	Accused Apple Products
	  Amazing by all accounts. 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. *See also* iPhone Features, (http://www.apple.com/iphone/features/mail.html), accessed on May 14, 2011, MOTO-APPLE-0006037953_126648:

'161 Patent Claim	Accused Apple Products
	See also, (http://www.apple.com/why-mac/better-hardware/), accessed on May 14, 2011, MOTO-APPLE-0006037953_126649:

'161 Patent Claim	Accused Apple Products
	Connect fast. Connect easy. 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.
a receiver coupled to the processing system for receiving second address information from another portable messaging unit	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. 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 and text message address information from another Apple iPhone (another portable messaging unit). *See, e.g.*, 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):

Exhibit F

'161 Patent Claim	Accused Apple Products

Exhibit F

'161 Patent Claim	Accused Apple Products

Exhibit F

'161 Patent Claim	Accused Apple Products
	Back of logic board with receiver circuitry disposed in a housing On the top of logic board: 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 STM33DH 3-axis accelerometer TriQuint TQM676091 338S0626

Exhibit F

'161 Patent Claim	Accused Apple Products
	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). *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:

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'161 Patent Claim	Accused Apple Products
	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, *e.g.*, email address information from another Accused Apple Product (another portable messaging unit). *See, e.g.*, 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:

Exhibit F

'161 Patent Claim	Accused Apple Products
	Step 6 Edit • Here's the new Airport board. The world's worst kept secret is that this is actually an 802.11n draft chipset. We're not aware of any way to get the n-functionality in OS X yet, but some have been successful in Boot Camp with drivers for the D-Link DWA-645. • Note the three antenna cables coming into the Airport board. The previous model only had two cables. The additional antenna could provide better reception, or different frequencies (802.11n uses both 2.4 GHz and 5 GHz) for the new wireless chipset.
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	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: (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:

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Exhibit F

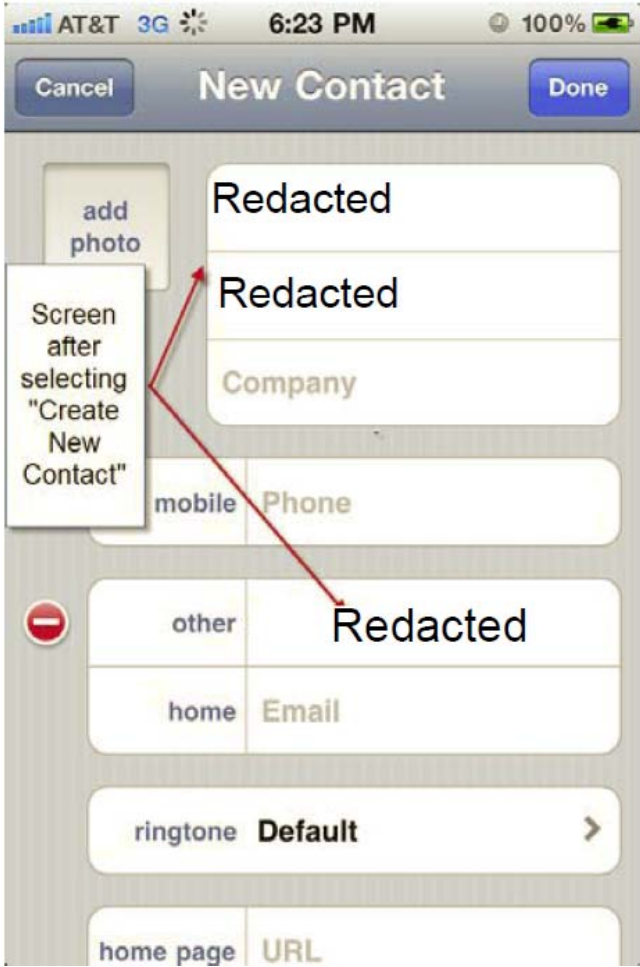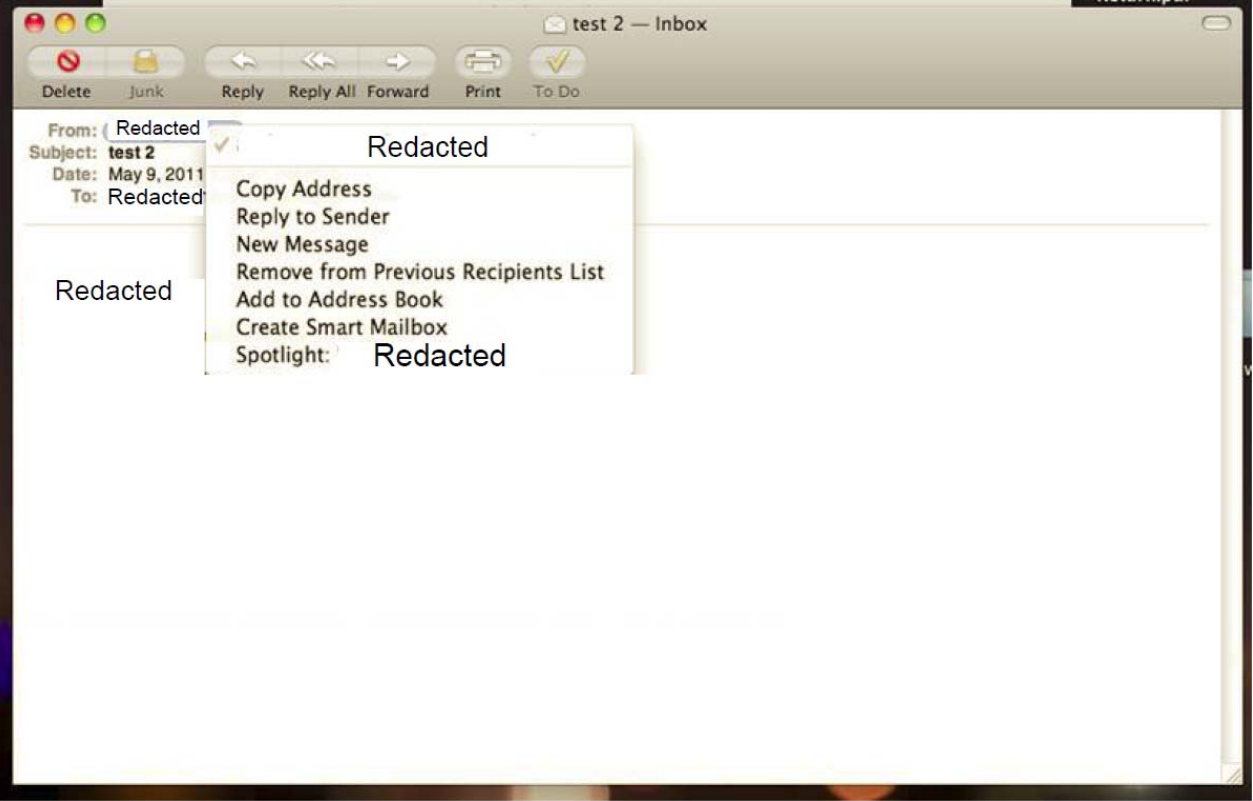| '161 Patent Claim	Accused Apple Products

Exhibit F

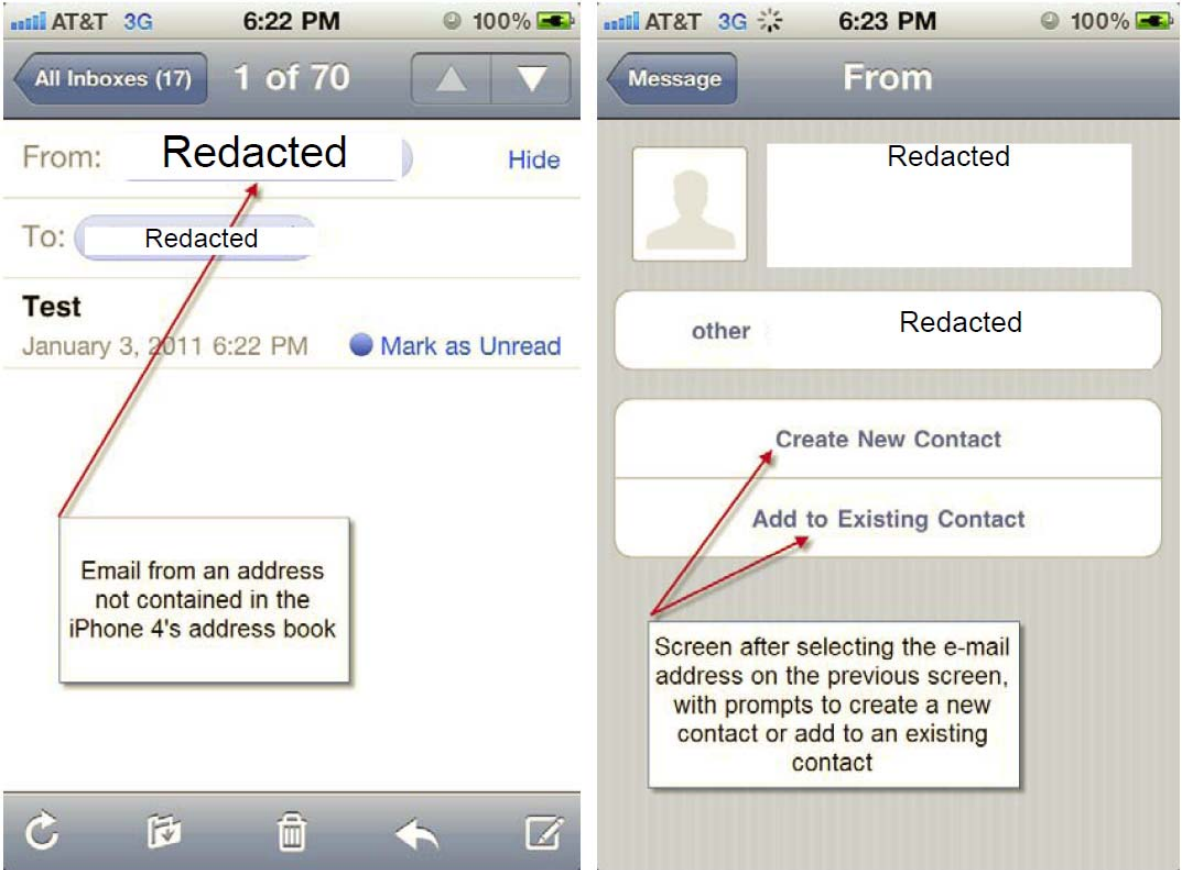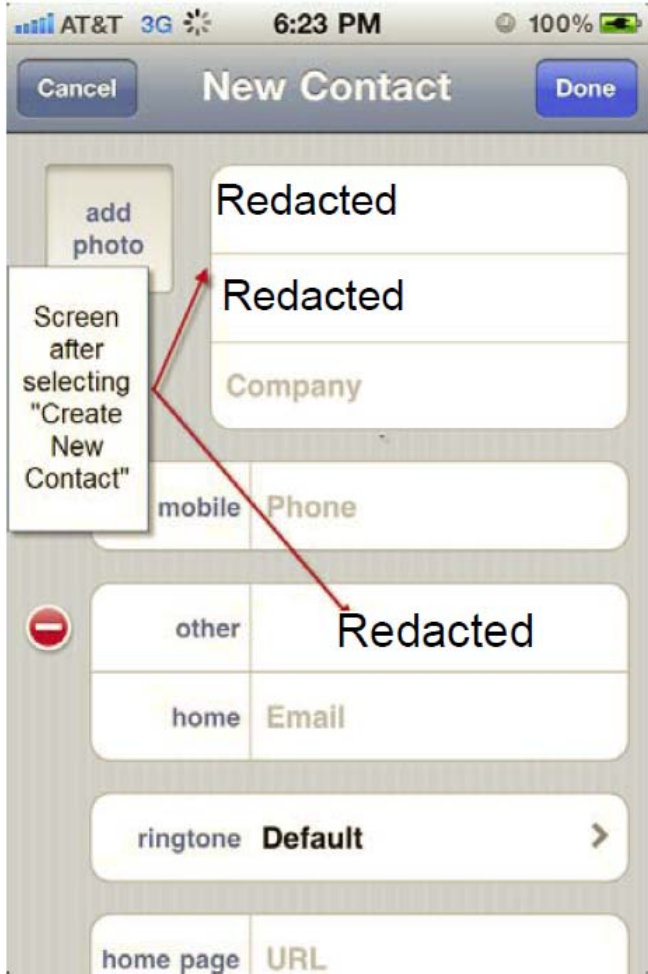| '161 Patent Claim	Accused Apple Products
	See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126645-46 (arrows and labels added). See also iPhone User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126751.

Exhibit F

'161 Patent Claim	Accused Apple Products
	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."
- -
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.

Exhibit F

'161 Patent Claim	Accused Apple Products
	Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641. - (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:

Exhibit F

'161 Patent Claim	Accused Apple Products
	See iPhone 4 Screen, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).
process the second address information in a predetermined	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,

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'161 Patent Claim	Accused Apple Products
manner selected in response to whether information identical to the second address information is stored in the address book.	(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:

Exhibit F

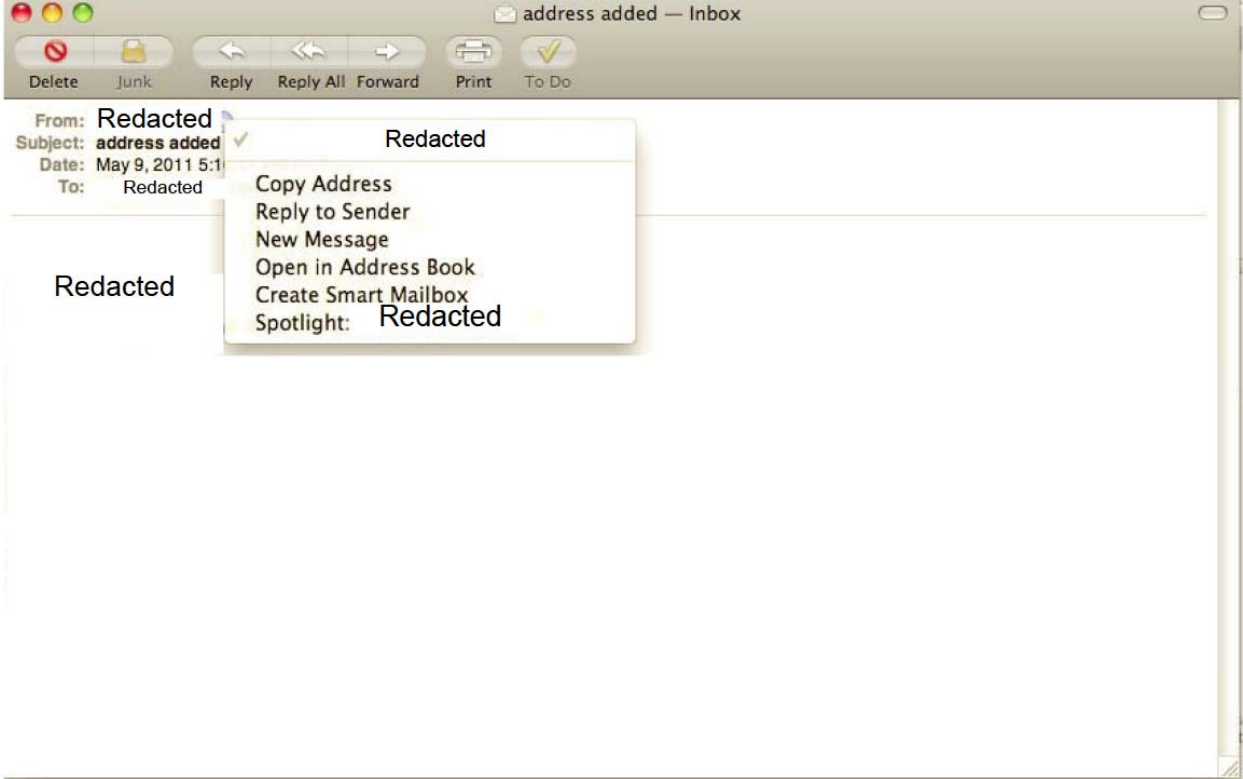| '161 Patent Claim	Accused Apple Products
	See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126645-46 (arrows and labels added).

Exhibit F

'161 Patent Claim	Accused Apple Products
	See also User Guide for iOS 4.2 and 4.3 Software, at MOTO-APPLE-0006037953_126751: 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." - 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.

Exhibit F

'161 Patent Claim	Accused Apple Products
	See Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126641. (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:

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'161 Patent Claim	Accused Apple Products

See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126643 (arrows and labels added).

- -

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:

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'161 Patent Claim	Accused Apple Products

See iPhone 4 Screenshots, taken January 3, 2011, MOTO-APPLE-0006037953_126644 (arrows and labels added).

See also Apple Computer Screenshot, taken May 9, 2011, MOTO-APPLE-0006037953_126642: |

'161 Patent Claim	Accused Apple Products
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	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. *See, e.g.*,

'161 Patent Claim	Accused Apple Products
address information is stored in the address book.	 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:
14. The portable messaging unit of claim	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

'161 Patent Claim	Accused Apple Products
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	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. *See* Claim 12 contentions above.
store the second address information in the address book, in response to an affirmative response to the prompt by the user.	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. *See* Claim 12 contentions above.