

EXHIBIT 2

From: Haskett, Christine
Sent: Tuesday, May 03, 2011 3:35 PM
To: 'Richard Erwine'
Cc: Moto-Apple-SDFL; Fram, Robert; Ernst, Samuel; Taub, Winslow; 'Cherensky, Steven'; Jill Ho; Haslam, Robert T; Lopez, Tony; 'Pace, Christopher'; Edward Mullins; Taylor, Ann M
Subject: Apple/Motorola: Florida schedule

Rich,

This confirms that if the court does not grant our joint motion, we have agreement on the following dates for Florida:

Infringement contentions: May 18 at noon Pacific time
Invalidity contentions: May 31
Exchange of claim terms: June 3
Exchange of proposed claim constructions: June 10
Opening claim construction brief (as currently scheduled): June 24

We have also agreed that if the court grants our joint motion, the deadlines in the joint motion will supersede the above and will apply from that point on. With respect to any of the above deadlines that have passed, but that would still be pending under the joint motion, we will meet and confer as to whether we will stand on the materials already exchanged or will renew our exchanges under the schedule set forth in the joint motion.

Thanks for your cooperation on these issues.

Christine

From: Richard Erwine [mailto:richarderwine@quinnemanuel.com]
Sent: Friday, April 29, 2011 3:09 PM
To: Haskett, Christine
Cc: Moto-Apple-SDFL; Fram, Robert; Ernst, Samuel; Taub, Winslow; 'Cherensky, Steven'; Jill Ho; Haslam, Robert T; Lopez, Tony; 'Pace, Christopher'; Edward Mullins
Subject: RE: Interim Joint Status Report (SD FL Action)

Thanks Christine. Mr. Piazza's assistant requested that I provide the name and contact information for each party's lead counsel for purposes of the mediation. Can you please send me that information for Apple's lead counsel?

Here is a draft of the Interim Joint Status Report. Please let me know if you have any changes or comments. We are not opposed to filing on Tuesday but perhaps we can file on Monday if everyone signs off.

Motorola's local counsel contacted Judge Ungaro's clerk this morning concerning the joint motion. The clerk indicated that Judge Ungaro was out of the office today due to a personal issue, but would be back on Monday. The clerk indicated that she will bring the joint motion to Judge Ungaro's attention on

Monday. Thus, I think we need to give Judge Ungaro a little more time to consider and hopefully grant our joint motion.

Regards,
Rich

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From: Haskett, Christine [mailto:HaskettCS@cov.com]
Sent: Friday, April 29, 2011 5:33 PM
To: Richard Erwine
Cc: Moto-Apple-SDFL; Fram, Robert; Ernst, Samuel; Taub, Winslow; 'Cherensky, Steven'; Jill Ho; Haslam, Robert T; Lopez, Tony; 'Pace, Christopher'
Subject: RE: Interim Joint Status Report (SD FL Action)

Rich,

Yes, we can do July 14.

On a separate topic, can we talk today about whether we can agree on an infringement contentions date, given that the court has not yet approved our stipulation? In light of the current schedule, we either need to reach an agreement on this issue or get something into the court on Monday. Thanks.

Christine

From: Richard Erwine [mailto:richarderwine@quinnemanuel.com]
Sent: Friday, April 29, 2011 12:43 PM
To: Haskett, Christine
Cc: Moto-Apple-SDFL; Fram, Robert; Ernst, Samuel; Taub, Winslow; 'Cherensky, Steven'; Jill Ho; Haslam, Robert T
Subject: RE: Interim Joint Status Report (SD FL Action)

Hi Christine:

Thanks for the e-mail. Is it possible for Apple to do the mediation on July 14? I originally thought both July 14 and July 15 worked for Motorola but I now understand that July 14 is preferable.

Thanks,

Rich

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From: Haskett, Christine [mailto:HaskettCS@cov.com]
Sent: Friday, April 29, 2011 2:18 PM
To: Richard Erwine
Cc: Moto-Apple-SDFL; Fram, Robert; Ernst, Samuel; Taub, Winslow; 'Cherensky, Steven'; Jill Ho; Haslam, Robert T
Subject: RE: Interim Joint Status Report (SD FL Action)

Rich,

Of the dates you suggest, Apple would prefer July 15, in San Francisco.

Also, because the court's scheduling order was entered on February 2 (although it was signed on February 1), we believe that the Joint Status Report is actually due on May 3. We look forward to receiving the draft report.

Regards,

Christine

From: Richard Erwine [mailto:richarderwine@quinnemanuel.com]
Sent: Thursday, April 28, 2011 12:13 PM
To: Haskett, Christine
Cc: Moto-Apple-SDFL; Fram, Robert; Ernst, Samuel; Taub, Winslow; 'Cherensky, Steven'; Jill Ho
Subject: Interim Joint Status Report (SD FL Action)

Christine:

Per the February 1, 2011 Scheduling Order, the parties are required to file an Interim Joint Status Report by Monday, May 2 in the SD FL action. One action item prior to filing the Report is for the parties to agree on a place, date, and time for mediation (we will then file the form Order of Referral to Mediation). I understand that Ed DeFranco has spoken to Apple's counsel about potential mediation dates, including July 14 or July 15. I have confirmed with Mr. Piazza's assistant that those dates work for him in San Francisco and asked her to hold those dates. Please confirm which of those two dates works for Apple and I will finalize the date with Mr. Piazza and file the form Order of Referral to Mediation.

I will also pass along a draft of the Interim Joint Status Report later today or tomorrow.

Regards,
Rich Erwine

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