

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

**Case No. 1:10cv023580-Civ-UU**

MOTOROLA MOBILITY, INC.,

Plaintiff,

vs.

APPLE INC.,

Defendant.

**JURY TRIAL DEMANDED**

APPLE, INC.,

Counterclaim Plaintiff,

vs.

MOTOROLA, INC., and  
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

**APPLE INC.'S RESPONSE IN SUPPORT OF MOTOROLA MOBILITY, INC.'S  
MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL**

On October 28, 2011 Motorola Mobility, Inc. (“Motorola”) filed a Motion for Leave to File Document Under Seal, which requests to file its Notice Concerning October 28, 2011 Infringement Contentions and Motion for Deadline For Final Infringement Contentions and Incorporated Memorandum of Law In Support (“Notice and Motion” ) under seal. For reasons explained more fully in the accompanying Supplemental Declaration of Christine Saunders Haskett in Support of Apple Inc.’s (“Apple”) Response to Motorola’s Motion for Leave to File Document Under Seal, Apple supports Motorola's Motion to file its Notice and Motion under seal, as they cite to confidential documents including those relating to the architecture and design of Apple products, as well as other competitively sensitive information that Apple holds in confidence.

Apple respectfully requests that the Court issue an order permitting Motorola to file under seal its Notice and Motion.

Dated: November 7, 2011

Respectfully submitted,

*/s/ Christopher R.J. Pace*

Christopher R. J. Pace

[christopher.pace@weil.com](mailto:christopher.pace@weil.com)

Edward Soto

WEIL, GOTSHAL & MANGES LLP

1395 Brickell Avenue, Suite 1200

Miami, FL 33131

Telephone: (305) 577-3100

Facsimile: (305) 374-7159

*Attorneys for Apple Inc.*

*Of Counsel:*

Matthew D. Powers

[Matthew.Powers@tensegritylawgroup.com](mailto:Matthew.Powers@tensegritylawgroup.com)

Steven Cherensky

[Steven.Cherensky@tensegritylawgroup.com](mailto:Steven.Cherensky@tensegritylawgroup.com)

Tensegrity Law Group LLP

Robert T. Haslam

[rhaslam@cov.com](mailto:rhaslam@cov.com)

COVINGTON & BURLING LLP

333 Twin Dolphin Drive, Suite 700

Redwood Shores, CA 94065

Telephone: (650) 632-4700

201 Redwood Shores Parkway  
Redwood Shores, CA 94065  
Telephone: 650-802-6000  
Facsimile: 650-802-6001

Jill J. Ho  
[jill.ho@weil.com](mailto:jill.ho@weil.com)  
WEIL, GOTSHAL & MANGES LLP  
201 Redwood Shores Parkway  
Redwood Shores, CA 94065  
Telephone: (650) 802-3000  
Facsimile: (650) 802-3100

Mark G. Davis  
[mark.davis@weil.com](mailto:mark.davis@weil.com)  
WEIL, GOTSHAL & MANGES LLP  
1300 Eye Street, N.W., Suite 900  
Washington, DC 20005  
Telephone: (202) 682-7000  
Facsimile: (202) 857-0940

Facsimile: (650) 632-4800

Robert D. Fram  
[rfram@cov.com](mailto:rfram@cov.com)  
Christine Saunders Haskett  
[chaskett@cov.com](mailto:chaskett@cov.com)  
Samuel F. Ernst  
[sernst@cov.com](mailto:sernst@cov.com)  
COVINGTON & BURLING LLP  
One Front Street  
San Francisco, CA 94111  
Telephone: (415) 591-6000  
Facsimile: (415) 591-6091

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2011, I filed the foregoing document with the Clerk of the Court. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List via email and CM/ECF.

/s/ Christopher R.J. Pace  
Christopher R.J. Pace (Fla. Bar No. 0721166)

**SERVICE LIST**  
**Case No. 1:10cv023580-Civ-UU**

Edward M. Mullins  
Fla. Bar No. 863920  
[emullins@astidavis.com](mailto:emullins@astidavis.com)  
ASTIGARRAGA DAVIS MULLINS & GROSSMAN, P.A.  
701 Brickell Avenue, 16th Floor  
Miami, FL 33131  
Telephone: (305) 372-8282  
Facsimile: (305) 372-8202

*Attorneys for Motorola Mobility, Inc.*

Electronically served via CM/ECF and via email

Of Counsel:

Charles K. Verhoeven  
David A. Perlson  
Anthony Pastor  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 93111  
(415) 875-6600

Raymond N. Nimrod  
Edward J. DeFranco  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
(212) 849-7000

David A. Nelson  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
500 West Madison Street, Suite 2450  
Chicago, IL 60661  
(312) 705-7400

[Moto-Apple-SDFL@quinnemanuel.com](mailto:Moto-Apple-SDFL@quinnemanuel.com)

*Attorneys for Motorola Mobility, Inc.*

Electronically served via email