

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

MOTOROLA MOBILITY, INC.,)	CASE NO. 1:10cv023580-Civ-UU
)	
Plaintiff / Counterclaim Defendant,)	
)	
v.)	
)	
APPLE INC.,)	
)	
Defendant / Counterclaim Plaintiff.)	
_____)	

DECLARATION OF JOHN DUCHEMIN

I, John Duchemin, declare as follows:

1. I am a member of the bar of the State of California and an associate at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Motorola Mobility, Inc. ("Motorola"). I make this declaration based on personal knowledge and if called as a witness could and would testify competently about these matters.

2. Attached as Exhibit 1 is a true and correct copy of Apple's Supplemental Responses to Motorola Mobility, Inc. and Motorola, Inc.'s First Set of Interrogatories (No. 2).

3. Attached as Exhibit 2 is a true and correct copy of the December 21, 2010 Preliminary Pretrial Conference Order in *Apple Inc., et al. v. Motorola, Inc. et al.*, Case No. 3:10-cv-00662-bbc (W.D. Wis.).

4. Attached as Exhibit 3 is a true and correct copy of Plaintiffs' March 4, 2011, Identification of Asserted Claims and Accused Products in *Apple Inc., et al. v. Motorola, Inc. et al.*, Case No. 3:10-cv-00662-bbc (W.D. Wis.).

5. Attached as Exhibit 4 is a true and correct copy of Plaintiffs' May 24, 2011 Second Supplemental Objections and Responses to Defendants' First Set of Interrogatories (No. 6) in *Apple Inc., et al. v. Motorola, Inc. et al.*, Case No. 3:10-cv-00662-bbc (W.D. Wis.).

6. Attached as Exhibit 5 is a true and correct copy of Exhibit B to Plaintiffs' May 24, 2011 Second Supplemental Objections and Responses to Defendants' First Set of Interrogatories (No. 6) in *Apple Inc., et al. v. Motorola, Inc. et al.*, Case No. 3:10-cv-00662-bbc (W.D. Wis.).

7. Attached as Exhibit 6 is a true and correct copy of the redacted Initial Expert Report of Dr. Nathaniel Polish Regarding Infringement of U.S. Patent Number 6,343,263, which is dated September 15, 2011 and was submitted by Apple in *Apple Inc., et al. v. Motorola, Inc. et al.*, Case No. 3:10-cv-00662-bbc (W.D. Wis.).

8. Attached as Exhibit 7 is a true and correct copy of e-mail correspondence between Brian Ferguson, counsel for Apple, and David Perlson, counsel for Motorola.

9. Attached as Exhibit 8 is a true and correct copy of the title page, plus pages 49-50, of the "Legal Principles" presentation that Apple presented to the Court on October 17, 2011 during the claim construction hearing in this case.

10. Attached as Exhibit 9 is a true and correct copy of an August 17, 2011 letter from Motorola counsel to Apple counsel regarding deficiencies in Apple's document production.

11. Attached as Exhibit 10 is a true and correct copy of a November 1, 2011 letter from Motorola counsel to Apple counsel regarding deficiencies in Apple's document production.

12. Attached as Exhibit 11 is a true and correct copy of e-mail correspondence between Ben Quarmby, counsel for Motorola, and Jill Ho, counsel for Apple.

13. Attached as Exhibit 12 is a true and correct copy of a November 9, 2011 letter from Motorola counsel to Apple counsel demanding Apple supplement its interrogatory responses.

14. Attached as Exhibit 13 is a true and correct copy of a November 9, 2011 letter from Motorola counsel to Apple counsel demanding Apple supplement its interrogatory responses.

15. Attached as Exhibit 14 is a true and correct copy of e-mail correspondence between Ben Quarmby, counsel for Motorola, and Christine Haskett, counsel for Apple.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 28, 2011, at Redwood Shores, California.

/s/

John Duchemin