

EXHIBIT 9

August 17, 2011

VIA E-MAIL

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Re: Motorola et al. v. Apple

Dear Christine and Jill:

I write concerning deficiencies in Apple's production in the S.D. Florida action. On December 29, 2010, Motorola served Apple with 88 Requests for Production.¹ On January 31, 2011, Apple agreed to produce "responsive, non-privileged documents" to over 80 of those Requests.² I have personally reviewed Apple's entire production, and, as I'm sure you are well aware, Apple has failed to produce the vast majority of the documents that it agreed to produce.

In response to Motorola's Requests for Production in the S.D. Florida action, Apple has produced a mere 1,148 documents. These documents are primarily composed of the patents at issue, portions of the prosecution histories of those patents, and publicly available information, such as prior art references, that Apple has relied upon in its infringement and invalidity contentions. It therefore appears that Apple has thus far ignored the vast majority of the Requests.

¹ See Motorola Mobility, Inc. and Motorola, Inc.'s First Set of Requests for Production to Apple Inc., dated December 29, 2010.

² See Apple's Objection and Responses to Motorola Mobility and Motorola's First Set of Requests for Production, dated January 31, 2011.

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Moreover, Apple's production is noticeably lacking in contemporaneous documents and communications. In fact, Apple's entire production does not include any emails or other contemporaneous correspondence between Apple employees. Expert reports are due soon, discovery is set to end in mere months, and Apple still has not produced a single email in response to Motorola's Requests in this action.

Finally, Apple currently refuses to produce documents responsive to Request Nos. 1, 27, 55, 63, 68, 74, and 81. Please identify your availability to meet and confer on these issues on Monday, August 22, 2011. I am available at any time.

I look forward to hearing from you.

Very truly yours,

/s/ Matthew O. Korhonen

Matthew O. Korhonen