

EXHIBIT 10

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November 1, 2011

VIA E-MAIL

Jill Ho, Esq.
Weil, Gotshal & Manges LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065

Re: Motorola Mobility, Inc. v. Apple Inc., 10-cv-3580

Dear Jill:

I write to follow up on Motorola's requests for production of documents in this case. To date, Apple has produced no documents responsive to many of Motorola Mobility's document requests and necessary for Motorola to evaluate the merits of its and Apple's claims and defenses.

Among other things, it appears to us that Apple has failed to provide a sufficient production of documents on the following subject matters:

1. **How Apple accused products filter html images.** Documents concerning this subject are responsive to : (1) Motorola Mobility's RFP No. 64, which requires production of "[a]ll documents and things that support, contradict, refute, or otherwise relate to Counterclaim-Defendants' allegations and contentions contained within the Complaint or Answer, Reply, and Counterclaims, including without limitation any documents supporting Mobility's allegations that Apple has infringed and is infringing the Mobility Asserted Patents;" (2) Motorola Mobility's RFP No. 66, which requires production of "[a]ll documents concerning the operation and design of any Apple Accused Instrumentality;" (3) Motorola Mobility's RFP No. 70, which requires production of "[a]ll documents which constitute product definition sheets, trade literature, specification

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sheets, technical data sheets, papers, abstracts, speeches, descriptive documents of any kind concerning any Apple Accused Instrumentality;” (4) Motorola Mobility’s RFP No. 71, which requires production, for each accused Apple instrumentality, of “a copy of each instruction manual, service manual, schematic, customer instruction sheet or brochure, product specification, data sheet, product announcement, press release, text of explanatory article, speech, lecture, or product roadmap (including, without limitation, information electronically disseminated or made available),” and (5) Motorola Mobility's RFPs Nos. 1, 48, 56, 58, 61, 67, and 68.

2. **If and how Apple accused products, as a result of a filter, exclude any data when downloading to a user's device.** Documents concerning this subject are responsive to the above-listed RFPs.
3. **Apple's MobileMe and iCloud server architecture, including host servers and communications servers, and how the Apple accused products interact with the network of the mobile carriers.** Documents concerning this subject are responsive to the above-listed RFPs.
4. **The "Load Remote Images" option on the iPhone, iPad and iMac computers, the uses of that option, and the reason or reasons Apple provides that option.** Documents concerning this subject are responsive to the above-listed RFPs.
5. **Apple's authentication system for the App Store and iTunes, and the use of that authentication system.** Documents concerning this subject are responsive to the above-listed RFPs. Although Apple has produced a few scattered documents that peripherally concern these subjects, Apple has produced no documents containing relevant details
6. **Apple’s “Fairplay” encryption system.** Documents concerning this subject are responsive to the above-listed RFPs.
7. **How Apple’s system recognizes a device requesting authorization of an app.** Documents concerning this subject are responsive to the above-listed RFPs. Although Apple has produced a few documents that peripherally concern these subjects, Apple has produced no documents containing relevant details.
8. **Apple's "UDID" number, how that number is used to authenticate a device, and/or any other reference used to authenticate a device.** Documents concerning this subject are responsive to the above-listed RFPs. Although Apple has produced a few scattered documents that peripherally concern these subjects, Apple has produced no documents containing relevant details.
9. **The mechanical structure of the iPhone 4 and 4S, including these accused products' antennae, accompanying "bumpers," and other details.** Documents concerning this subject are responsive to the above-listed RFPs. Although Apple has produced a few scattered documents that peripherally concern these subjects, Apple has produced no documents containing relevant details.

10. **The effect that the external antenna and bumper have on reception.** Documents concerning this subject are responsive to the above-listed RFPs. Although Apple has produced a few scattered documents that peripherally concern these subjects, Apple has produced no documents containing relevant details.
11. **Apple's decision to use the antenna design of the iPhone 4 and iPhone 4S.** Documents concerning this subject are responsive to the above-listed RFPs. Although Apple has produced a few scattered documents that peripherally concern these subjects, Apple has produced no documents containing relevant details.
12. **How Apple synchronizes message status among multiple devices, and how Apple's MobileMe and iCloud services are used to synchronize a user's message status.** Documents concerning this subject are responsive to the above-listed RFPs.
13. **How Apple's devices determine whether an address is already in the user's contacts.** Documents concerning this subject are responsive to the above-listed RFPs.
14. **The options provided to the user based on the determination that an address is or is not already in the user's contacts.** Documents concerning this subject are responsive to the above-listed RFPs.

Additionally, please promptly make source code available for categories 1-8 and 12-14.

By November 7, for each category of documents and source code, please confirm that Apple will make source code available will supplement its production or confirm that no such documents exist. Also inform us when we can expect the production and source code will be made available.

Apple has previously justified its lack of document production by pointing to the parties' agreement to cross-produce documents from other cases. *See, e.g.*, August 18, 2011, 5:25 p.m. e-mail from Apple counsel Jill Ho to Motorola counsel Matt Korhonen. Despite the cross-production agreement, however, Apple's production to date contains no documents regarding the specific issues above, except for a few that peripherally touch on certain of these subjects, and so Apple's document production continues to be deficient.

As always, we remain willing to meet and confer to resolve any discovery issues, and hope that you similarly remain willing to work together on these issues in a timely and efficient manner.

Very truly yours,

/s/

David Perlson
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