

# EXHIBIT 13

# COVINGTON & BURLING LLP

ONE FRONT STREET  
SAN FRANCISCO, CA 94111-5356  
TEL 415.591.6000  
FAX 415.591.6091  
WWW.COV.COM

BEIJING  
BRUSSELS  
LONDON  
NEW YORK  
SAN DIEGO  
SAN FRANCISCO  
SILICON VALLEY  
WASHINGTON

**LESLIE N. HARVEY**  
TEL 415.591.7013  
FAX 415.955.6513  
LHARVEY@COV.COM

November 8, 2011

BY EMAIL

David Perlson  
Quinn Emanuel  
50 California Street, 22nd Floor  
San Francisco, CA 94111

Re: *Motorola Mobility v. Apple*, Southern District of Florida Case No.  
1:10-cv-023580

Dear David:

I am in receipt of your letter of November 1, 2011 to Jill Ho regarding Apple's production of documents in the above-referenced case. As you know, Apple has produced many documents in this matter already, including documents produced in the related ITC matters subject to a cross-use agreement. Apple has been and will continue to supplement its production as it locates additional responsive documents.

Your letter requests documents about a number of devices and technologies that are not at issue in this litigation. As you know, it is Apple's position that iCloud, Fairplay, the App Store, iTunes, and the iPhone 4S have not been accused. Accordingly, Apple will not produce documents relating to these subjects (referenced in topics 5, 6, 7, and 8 and partially in topics 3, 9, 10, 11, and 12 in your November 1 letter).

As for the remainder of your requests, Apple is preparing additional documents to produce shortly on those subjects. Specifically, Apple will produce documents, to the extent any exist, on the following topics in your letter: 1, 2, 3 (only as to Mobile Me), 4, 9 (only as to the iPhone 4), 10 (only as to the iPhone 4), 11 (only as to the iPhone 4), 12 (only as to MobileMe), 13, and 14.

Your letter also requests that Apple produce source code for topics 1-8 and 12-14. Apple will not produce the source code related to iCloud, Fairplay, the App Store, iTunes, and the iPhone 4S for the reasons stated above. Apple has already produced to Motorola source code for

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the Address Book. Apple is also continuing to collect source code for MobileMe synchronization and will produce it soon. As for any remaining code requested in your letter, please explain why source code is necessary.

Sincerely,

*/s/ Leslie Harvey*

Leslie Harvey