

EXHIBIT D

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

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

**MOTOROLA MOBILITY, INC. AND MOTOROLA, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION TO APPLE INC. (NOS. 1-88)**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff/Counterclaim Defendant Motorola Mobility, Inc. ("Mobility") and Counterclaim Defendant Motorola, Inc. ("Motorola") (collectively, "Counterclaim-Defendants") request that Defendant Apple Inc. respond fully and in writing to this First Set of Requests for the Production of Documents and Things ("Requests") and produce the documents and things requested herein in accordance with the following instructions and definitions at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor New York, NY 10010 within thirty (30) days from the date of service of these Requests.

REQUEST FOR PRODUCTION NO. 14.

All communications and correspondence between Apple and the named inventors of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 15.

All documents concerning the scope, validity, or enforceability of any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 16.

All documents concerning any secondary consideration or other objective evidence of non-obviousness of the Apple Asserted Claims, including commercial success, long-felt need, commercial acquiescence, expressions of skepticism, copying, teaching away, failed attempts by others, or simultaneous development and any nexus between such secondary consideration or other objective evidence of non-obviousness and the Apple Asserted Claims.

REQUEST FOR PRODUCTION NO. 17.

All documents and things concerning Apple's contention as to what constituted the level of skill of a person of ordinary skill in the art to which the subject matter of each of the Apple Asserted Patents pertains, at the time of filing with the U.S. Patent and Trademark Office the original application resulting in each Apple Asserted Patent.

REQUEST FOR PRODUCTION NO. 18.

All documents and things concerning any Prior Art relating to the Apple Asserted Patents, including any document or thing identified as potential Prior Art to Apple by any third party.

Dated: December 29, 2010

Respectfully submitted,

/s/ Mark D. Baker

Edward J. DeFranco

Alexander Rudis

Mark D. Baker

Quinn Emanuel Urquhart & Sullivan, LLP

51 Madison Avenue, 22nd Floor

New York, New York 10010

Tel.: (212) 849-7000 / Fax: (212) 849-7100

Charles K. Verhoeven

Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor

San Francisco, California 94111

Tel.: (415) 875-6600 / Fax: (415) 875-6700

David A. Nelson

Quinn Emanuel Urquhart & Sullivan, LLP

500 West Madison Street, Suite 2450

Chicago, Illinois 60661

Tel.: (312) 705-7400 / Fax: (312) 705-7401

Edward M. Mullins

Astigarraga Davis Mullins & Grossman, P.A.

701 Brickell Avenue, 16th Floor

Miami, Florida 33131

Tel.: (305) 372-8282 / Fax: (305) 372-8202

*Attorneys for Motorola Mobility, Inc. and
Motorola, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 29, 2010, I served the following document via electronic mail on all counsel of record identified on the attached Service List.

/s/ Mark Baker
Mark Baker

SERVICE LIST
Motorola Mobility, Inc. versus Apple Inc.
Case No. 1:10cv023580-Civ-UU
United States District Court, Southern District of Florida

Christopher R.J. Pace
christopher.pace@weil.com
Weil, Gotshal & Manges LLP
1395 Brickell Avenue, Suite 1200
Miami, Florida 33131
Tel.: (305) 577-3100

Matthew D. Powers
matthew.powers@weil.com
Steven S. Cherensky
steven.cherensky@weil.com
Jill J. Ho
jill.ho@weil.com
Weil, Gotshal & Manges, LLP
201 Redwood Shores Parkway
Redwood Shores, California 94065-1134
Telephone: (650) 802-3000

Mark G. Davis
mark.davis@weil.com
Weil, Gotshal & Manges LLP
1300 Eye Street, N.W., Suite 900
Telephone: (202) 682-7000

Patricia Young
patricia.young@weil.com
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000

Apple.Motorola.FL.WGM.Service@weil.com

Attorneys for Apple, Inc.
Electronically served via email