EXHIBIT D

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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

JURY TRIAL DEMANDED

APPLE INC.,

Defendant.

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