

Exhibit B

Ho, Jill

From: Ho, Jill
Sent: Tuesday, December 06, 2011 9:17 AM
To: Cathleen Garrigan; John Duchemin (johnduchemin@quinnemanuel.com); emullins@astidavis.com; Moto-Apple-SDFL (Moto-Apple-SDFL@quinnemanuel.com)
Cc: Weil_TLG Apple Moto FL External; AppleCov@cov.com
Subject: RE: Motorola v. Apple (SDFL): Supplemental Preliminary Invalidation Contentions

Hi Cathleen,

Please let me know if Motorola will withdraw its supplemental invalidity contentions, particularly in light of the Court's order granting Apple's motion to strike that just issued.

Best regards,
Jill

From: Cathleen Garrigan [mailto:cathleengarrigan@quinnemanuel.com]
Sent: Wednesday, November 30, 2011 3:44 PM
To: Ho, Jill; John Duchemin; AppleCov; Apple Moto Weil
Cc: Moto-Apple-SDFL; emullins@astidavis.com
Subject: RE: Motorola v. Apple (SDFL): Supplemental Preliminary Invalidation Contentions

Jill,

We would like to meet and confer regarding Apple's position on this issue. Please let us know if you are available to meet and confer tomorrow at 2pm pacific.

Best,
Cathleen

From: Ho, Jill [mailto:jill.ho@weil.com]
Sent: Wednesday, November 30, 2011 12:45 PM
To: John Duchemin; AppleCov; Apple Moto Weil
Cc: Moto-Apple-SDFL
Subject: RE: Motorola v. Apple (SDFL): Supplemental Preliminary Invalidation Contentions

Hi John,

Our position, as we've stated repeatedly, is that unless and until the Court rules otherwise, the current deadlines concerning contentions govern. Please withdraw your supplemental invalidity contentions.

Best regards,
Jill



Jill Ho

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From: John Duchemin [mailto:johnduchemin@quinnemanuel.com]
Sent: Wednesday, November 30, 2011 11:48 AM
To: AppleCov; Apple Moto Weil
Cc: Moto-Apple-SDFL
Subject: Motorola v. Apple (SDFL): Supplemental Preliminary Invalidation Contentions

Counsel,

Attached are Motorola's Supplemental Preliminary Invalidation Contentions including Supplemental Exhibits D, E and F. The supplemental invalidity contentions are served in response to ongoing discovery, including but not limited to Apple's late production of prior art from its litigation against Samsung in the Netherlands and positions that Apple first revealed at the technical tutorial and Markman hearings regarding the alleged inventions disclosed in the '116 and '646 patents.

Given Apple's position regarding infringement contentions, please let us know by close of business tomorrow if Apple contends that, despite the fact that its own June 20 invalidity contentions served after the Court's June 1 Order reserved Apple's right to supplement its invalidity contentions in light of the continuing discovery process, the June 20 were intended to be "final contentions," or if it intends to seek to strike these supplemental contentions.

Regards,
John

John Duchemin
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

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