

EXHIBIT B

**IN THE 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.

**APPLE’S THIRD SET OF INTERROGATORIES
TO MOTOROLA MOBILITY AND MOTOROLA (NOS. 16-22)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant and Counterclaim Plaintiff Apple Inc. (“Apple”) requests that Plaintiff and Counterclaim Defendant Motorola Mobility, Inc. (“Motorola Mobility”) and Counterclaim Defendant Motorola, Inc. (“Motorola”) (collectively, the “Counterclaim Defendants”) answer separately, fully, in writing, and under oath the following interrogatories within thirty (30) days after service hereof. Pursuant to Federal Rule of Civil Procedure 26(e), these

interrogatories are continuing in nature and therefore require Counterclaim Defendants to furnish supplemental answers whenever they obtain different or additional knowledge, information, or beliefs relative to these interrogatories.

DEFINITIONS

The definitions in Apple Inc.'s First Set of Interrogatories (Nos. 1-10) and Second Set of Interrogatories (Nos. 11-15) are incorporated by reference.

INSTRUCTIONS

The instructions in Apple Inc.'s First Set of Interrogatories (Nos. 1-10) are incorporated by reference.

INTERROGATORIES

INTERROGATORY NO. 16:

For each Motorola Accused Mobile Device, describe in detail how to lock and unlock the touchscreen, including without limitation (i) the conditions under which the touchscreen becomes locked; (ii) the way(s) in which a user may unlock a locked touchscreen; (iii) any graphical elements presented by the user interface when the touchscreen is locked; (iv) whether such graphical element(s) are interactive and, if so, how a user may interact with such graphical element(s); and (v) an identification by file name(s) and directory location(s) of the software, firmware, or other source code used to implement any of the aforementioned locking and unlocking functionalities.

INTERROGATORY NO. 17:

For each Motorola Accused Mobile Device, identify with specificity, including by file name(s) and directory location(s), the software, firmware, or other source code that (i) detects the addition or removal of additional devices or peripherals; (ii) detects the

addition or removal of additional display devices; or (iii) allocates video output between the built-in display and additional display devices, including but not limited to the external display service and any related libraries (*e.g.*, *extdisp*service, *ixtdisp*service, and *nativehdmi*apis) as well as any software drivers for any HDMI transmitters provided by third parties.

INTERROGATORY NO. 18:

For each Motorola Accused Mobile Device, identify with specificity, including by file name(s) and directory location(s), the software, firmware, or other source code that implements the Webtop and (HD) Entertainment Center applications.

INTERROGATORY NO. 19:

Identify each cable service provider that is or has been a party to a license, service, or other agreement with Motorola and provide a narrative description of the relationship between Motorola and each such cable service provider.

INTERROGATORY NO. 20:

Identify with specificity, each and every Motorola set-top box manufactured, used, distributed, sold, offered for sale, or imported with an interactive program guide, by or on behalf of Motorola, including without limitation the model name, trade name, marketing name, internal name, type, description, design number, catalog number, and all other names and/or designations used to identify such Motorola set-top boxes, and including any associated hardware, such as remote control devices.

INTERROGATORY NO. 21:

For each Motorola set-top box and associated hardware identified in response to Interrogatory No. 20 above, identify with specificity each entity who is or has been involved

with the research, engineering, design, development, implementation, revision, support, or provision of any version of the interactive program guides running on such Motorola set-top boxes, including without limitation the name and location of each such entity, its relationship with Motorola, and a narrative description of its involvement.

INTERROGATORY NO. 22:

For each Motorola set-top box and associated hardware identified in response to Interrogatory No. 20 above, identify with specificity, including as appropriate the internal and external part name and number, model name or number, manufacturer, source, supplier, file name(s), directory name(s), and any version number, each microchip, microprocessor, microcontroller, chipset, software, firmware, source code or other component that implements, supports, or provides interactive program guide functions, including without limitation mechanisms for obtaining television programming information from a source signal, television programming listing displays, picture-in-picture displays, program reminder mechanisms, program marking mechanisms, and recording mechanisms.

Dated: November 14, 2011

Respectfully submitted,

/s/ Jill J. Ho

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 14, 2011, I served the foregoing document via electronic mail on all counsel of record identified on the attached Service List.

/s/ Jill Ho
Jill Ho

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

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