

EXHIBIT G

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November 21, 2011

VIA E-MAIL

Jill Ho, Esq.
Weil, Gotshal & Manges LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065

Re: Motorola Mobility, Inc. v. Apple Inc., 10-cv-3580

Dear Jill:

I write to address a number of the discovery issues raised during yesterday's meet and confer.

First, Apple has objected to the proposed date of January 16, 2011 for the deposition of Gene Eggleston. Mr. Eggleston is also available for a deposition on January 11, 2011. Please confirm this date works for Apple.

Second, Motorola designates Joy Ganvik as its corporate representative to testify on topics 11 and 34 of Apple's Notice of 30(b)(6) Deposition of Motorola ("Apple's 30(b)(6) Notice"), subject to the objections set forth in Motorola's response thereto. Ms. Ganvik is available for deposition on December 16, 2011. Please confirm that date works for Apple.

Third, Motorola designates Kirk Dailey as its corporate representative to testify on topics 18, 41, 42, 44, 47, 48, 49, 50 and 54 of Apple's 30(b)(6) Notice, subject to Motorola's objections. Mr. Dailey is available for deposition on December 13, 2011. Please confirm that date works for Apple.

Fourth, we are looking for dates for Terri Hughes to testify in her individual capacity.

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Fifth, and as noted in my November 14, 2011 letter to you, Motorola believes that Apple's subpoenas on third parties – and Motorola clients – AT&T, Inc., Comcast Corp., Mediacom Communications Corp., Time Warner Cable, Inc., Bright House Networks, LLC, Charter Communications, Inc., Cox Communications, Inc., and Suddenlink Communications ("the Third-Party Subpoenas") contain discovery requests that can be addressed by Motorola. Examples of such requests include Topics 1, 2, 3 and 4, and Document Requests 1, 2, 3, 4, 16 and 17 of each of the Subpoenas. We look forward to discussing this matter with you during our next meet and confer.

Sixth, you requested that Motorola provide further explanations for its request to review the MobileMe source code before Apple could consent to producing said code. As you know and as we discussed on our meet and confer, the process whereby Apple's systems and products synchronize information across multiple user devices is at issue in this matter. (See Apple's Technology Tutorial Slides for the '119 Patent beginning on Slide 28). Also relevant to this case is the process used by Apple's systems to filter SPAM from a user's incoming email stream. (See Apple's Technology Tutorial Slides for the '006 and '531 Patents, beginning on Slide 18). As you requested, we direct you to Apple's explanation of the technology at issue in these slides and ask for the code relating to that technology. We look forward to confirmation from Apple that it will produce this code as soon as possible on our meet and confer today.

Seventh, you indicated during our meet and confer on November 17, 2011 that Apple would investigate whether it intended to comply with Motorola's Requests for Production Nos. 27, 63 and 68. Please let us know whether Apple intends to produce documents in response to those requests.

Eighth, the parties discussed during last week's meet and confer Motorola's responses and objections to Apple's requests for production Nos. 2-10, 21, 22, 34, 39, 43 and 46, and Apple's interrogatories Nos. 7, 8, 14 and 15. Motorola is making internal inquiries in connections with those requests, and will address them in separate correspondence to Apple.

Ninth, you confirmed that Apple will not be producing deposition testimony, source code or documents regarding iCloud and/or iPhone 4s for the reasons stated in your motion to strike Motorola's supplemental infringement contentions. We are at an impasse on this issue.

Finally, you proposed that the parties mutually agree to supplement their responses to certain interrogatories by December 16, 2011. We understand that the corresponding interrogatories include the following:

<i>Motorola Interrogatories to Apple</i>	<i>Apple Interrogatories to Motorola</i>
No. 1	No. 1
No. 3	No. 3
No. 5	N/A
No. 8	No. 12

No. 9	No. 11
No. 11	No. 7
No. 12	No. 9
No. 13	Nos. 20, 22
No. 14	N/A
No. 15	No. 13

We look forward to discussing this matter and others with you during our next meet and confer.

Very truly yours,

/s/

Benoit Quarmby

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