

EXHIBIT 11

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December 14, 2011

BY EMAIL

David Perlson
Quinn Emanuel
50 California Street, 22nd Floor
San Francisco, CA 94111

Re: *Motorola Mobility v. Apple*, Southern District of Florida Case No.
1:10-cv-023580

Dear David:

I write to discuss Motorola's refusal to identify its own products that practice its patents asserted in the above-captioned case ("embodying products").

Apple has served multiple requests asking Motorola to identify embodying products and to provide certain information about those products. For example, Apple's Interrogatory 12 asks Motorola to identify "all devices manufactured, sold, or used by You or any non-party to this Action that You believe has embodied, practiced, fallen within the scope of, used, or been marked with the Motorola Mobility Patents-in-Suit." In addition, many of Apple's Requests for Production to Motorola seek documents relating to embodying products and sales of embodying products. See Requests for Production 5-7, 9, 23, 35, and 36.

During our last meet-and-confer call relating to these requests, you stated that Motorola would only identify "representative" embodying products, not all embodying products. This position is unacceptable to Apple. Motorola has admitted that it never marked any products with the patents asserted in this case. As I explained during our meeting, if Motorola was selling products without marking during the six years before this lawsuit was filed, it might be barred from claiming damages during that time. In addition, as you noted during the same call, a party's use of its own asserted patents, and the commercial success of products practicing such patents, are relevant to multiple *Georgia-Pacific* factors.

We remain willing to meet and confer to limit this request to reduce the burden to Motorola. For example, if multiple embodying products were sold during overlapping intervals in the six years before this suit was brought, we would accept Motorola's identification of just one representative product from each time period during the six years, and production of

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documents relating to those products. Apple is willing to make reciprocal identifications and productions for its own embodying products sold during the six years before its counterclaims were asserted in response to Motorola's requests for discovery about such products. These requests include Motorola's Requests for Production 4, 16, 25-27 and Motorola's Interrogatories 5 and 8.

We would like to meet and confer regarding the proposed limitations to the parties' discovery requests. Are you, or other members of your team, available to discuss on Friday of this week?

Sincerely,

/s/ Elena DiMuzio

Elena DiMuzio