

EXHIBIT 14

DiMuzio, Elena

From: DiMuzio, Elena
Sent: Tuesday, December 20, 2011 11:56 AM
To: 'Marshall Searcy'; Haskett, Christine
Cc: David Perlson; Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; AppleCov
Subject: RE: Apple/Moto SDFL: Letter re Production of Embodying Products

Marshall,

Thanks, I look forward to talking to you at 11 PST tomorrow.

Ben had asked for some authority for our position on the obligation to produce information about a party's own embodying products. Please see, for example, *Aristocrat Techs. v. Int'l Game Tech.*, No. C 06-03717 RMW (RS), 2009 WL 3573327 at *2 (N.D. Cal. Oct. 30, 2009) (granting motion to compel embodying products information, and noting that "Aristocrat, as the plaintiff and the patent holder in this infringement suit, presumably is in the position to identify which of its own products make use of the patented technology."). In light of Motorola's position that it is claiming damages starting 6 years before the case was filed, information about whether it had an obligation to mark is directly relevant to the damages it can claim in this case.

Regards,
Elena.

From: Marshall Searcy [mailto:marshallsearcy@quinnemanuel.com]
Sent: Tuesday, December 20, 2011 8:43 AM
To: DiMuzio, Elena; Haskett, Christine
Cc: David Perlson; Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; AppleCov
Subject: Re: Apple/Moto SDFL: Letter re Production of Embodying Products

Christine, what time are you available on Wednesday? I will send around a conference call number that we can use for both calls.

On Dec 19, 2011, at 10:48 PM, "DiMuzio, Elena" <edimuzio@cov.com> wrote:

Marshall,

I can talk at 11 am on Wednesday. However, for issues relating to source code production, you will need to coordinate with Christine Haskett. I understand she is available on Wednesday afternoon, but she cannot join a call at 11. I am not available on Wednesday afternoon.

Shall I call your office directly on Wednesday?

Thanks.

Elena.

From: Marshall Searcy [mailto:marshallsearcy@quinnemanuel.com]
Sent: Monday, December 19, 2011 5:51 PM
To: DiMuzio, Elena; David Perlson; Moto-Apple-SDFL
Cc: 'Weil_TLG Apple Moto FL External'; AppleCov
Subject: RE: Apple/Moto SDFL: Letter re Production of Embodying Products

Hi Elena,

I'm available at 11 am LA time on Wednesday. We'd also like to discuss the issues set out in Matt Korhonen's e-mails about Apple's source code production.

Marshall

From: DiMuzio, Elena [mailto:edimuzio@cov.com]
Sent: Monday, December 19, 2011 5:32 PM
To: Marshall Searcy; David Perlson; Moto-Apple-SDFL
Cc: 'Weil_TLG Apple Moto FL External'; AppleCov
Subject: RE: Apple/Moto SDFL: Letter re Production of Embodying Products

Marshall,

Please see below. Ben asked that we contact you in his absence.

Regards,

Elena.

From: DiMuzio, Elena
Sent: Monday, December 19, 2011 4:31 PM

To: Ben Quarmby; David Perlson; Moto-Apple-SDFL
Cc: 'Weil_TLG Apple Moto FL External'; AppleCov
Subject: RE: Apple/Moto SDFL: Letter re Production of Embodying Products

Ben,

Are you available to meet Wednesday between 9 am - 12 pm PST to discuss this?

Regards,

Elena.

From: Ben Quarmby [mailto:benquarmby@quinnemanuel.com]
Sent: Friday, December 16, 2011 7:34 AM
To: DiMuzio, Elena; David Perlson; Moto-Apple-SDFL
Cc: 'Weil_TLG Apple Moto FL External'; AppleCov
Subject: RE: Apple/Moto SDFL: Letter re Production of Embodying Products

Dear Elena –

I write in response to your letter dated December 14, 2011 regarding Apple's request that Motorola identify any its products that embody the inventions claimed in the asserted Motorola patents. We agree that this topic was discussed during a recent meet and confer, but disagree with your characterization of Motorola's representations. Motorola has consistently made clear that, to the extent it was to rely on any particular product or system as embodying its patents, it would identify such product or system to Apple. But there is no authority supporting your proposition that Motorola is under an obligation to conduct an exhaustive review of its many products to determine which, if any, embody any of the 6 asserted Motorola patents – and indeed your letter cites to none. We remain, however, willing to meet and confer on this matter. Please let us know whether you are available for a call early next week.

Best regards,

Ben Quarmby

From: DiMuzio, Elena [mailto:edimuzio@cov.com]
Sent: Wednesday, December 14, 2011 8:20 PM
To: David Perlson; Moto-Apple-SDFL
Cc: Weil_TLG Apple Moto FL External; AppleCov
Subject: Apple/Moto SDFL: Letter re Production of Embodying Products

David,

Please see attached letter.

Best Regards,

Elena.

Elena DiMuzio | Associate | **COVINGTON & BURLING LLP**
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