

# EXHIBIT 1

**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.

**MOTOROLA MOBILITY, INC.’S RESPONSES TO  
APPLE’S SECOND SET OF INTERROGATORIES (NOS. 11-15)**

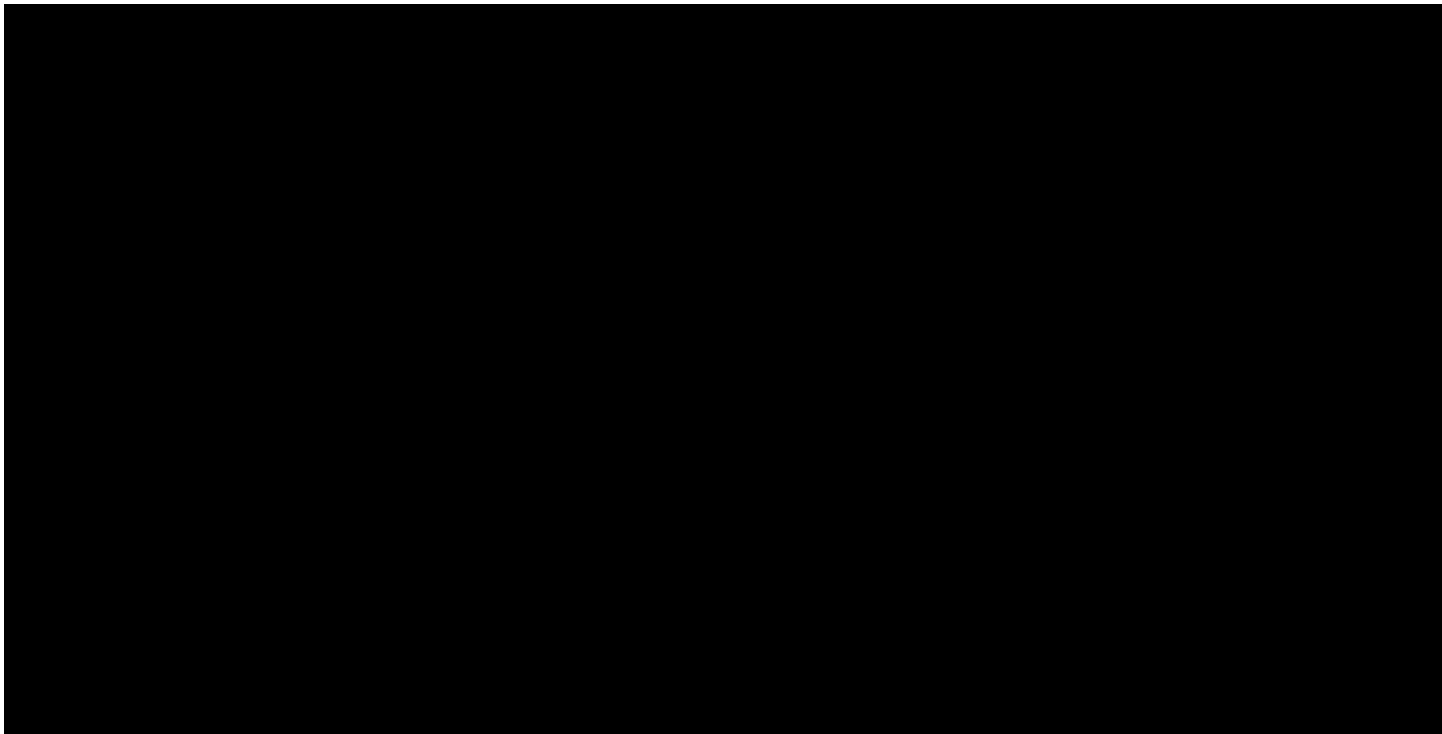
Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff and Counterclaim-Defendant Motorola Mobility, Inc. (“Mobility”) responds to Defendant and Counterclaim-Plaintiff Apple Inc’s (“Apple”) Interrogatories Nos. 11-15 (“Interrogatories”).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**INTERROGATORY NO. 12:**

Separately for each asserted claim of each of the Motorola Mobility Patents-in-Suit, 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.

**RESPONSE TO INTERROGATORY NO. 12:**

Mobility incorporates its Preliminary Statement and General Objections set forth above as though set forth fully herein. Mobility objects to this interrogatory to the extent that it seeks to elicit information subject to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other applicable privilege or immunity. Mobility further objects to this interrogatory to the extent it calls for a legal conclusion or presents a question of law. Mobility further objects to this interrogatory to the extent it calls for information regarding the devices of "any non-party to this

action." This request seeks information and/or documents that are outside of Mobility's possession, custody or control.

Mobility further objects to this interrogatory to the extent it calls for Mobility's contentions or expert opinion regarding which devices have "embodied, practiced, fallen within the scope of, used, or been marked with the Motorola Mobility Patents-in-Suit." This request is premature in light of the Court's February 2, 2011 Scheduling Order directing the parties to provide opening expert reports on November 4, 2011. Mobility is still investigating the claims and defenses at issue in this case. Mobility will provide responses regarding its contentions on the timeframe set by the Court, after it has had an opportunity to seek discovery regarding its contentions.

Subject to and without waiving its General Objections and the foregoing specific objections, Mobility states that it has accused third party products of infringing one or more claims of the following patents:

U.S. Patent No. 5,958,006: BlackBerry Pearl 8100, 8110, 8120, 8130, 8220, 8230; BlackBerry Storm 9500, 9530; BlackBerry Bold 9000; BlackBerry Curve 8900, 8300, 8310, 8320, 8330, 8350i; BlackBerry 8800, 8820, 8830.

U.S. Patent No. 6,101,531: BlackBerry Enterprise Solution including the BlackBerry Enterprise Server.

Mobility has not yet completed its discovery and investigation of the facts relating to this interrogatory. Mobility will supplement this response at the appropriate time and as its investigation continues, in accordance with Federal Rule of Civil Procedure 26(e) and the schedule ordered by the Court.

**INTERROGATORY NO. 13:**

Separately identify each product manufactured, sold, or used by You or any non-party to this Action that has been marked with any of the Motorola Mobility Patents-in-Suit, including a detailed description of: (i) the dates on which said products were offered for sale and (ii) the dates on which said products were marked.

**RESPONSE TO INTERROGATORY NO. 13:**

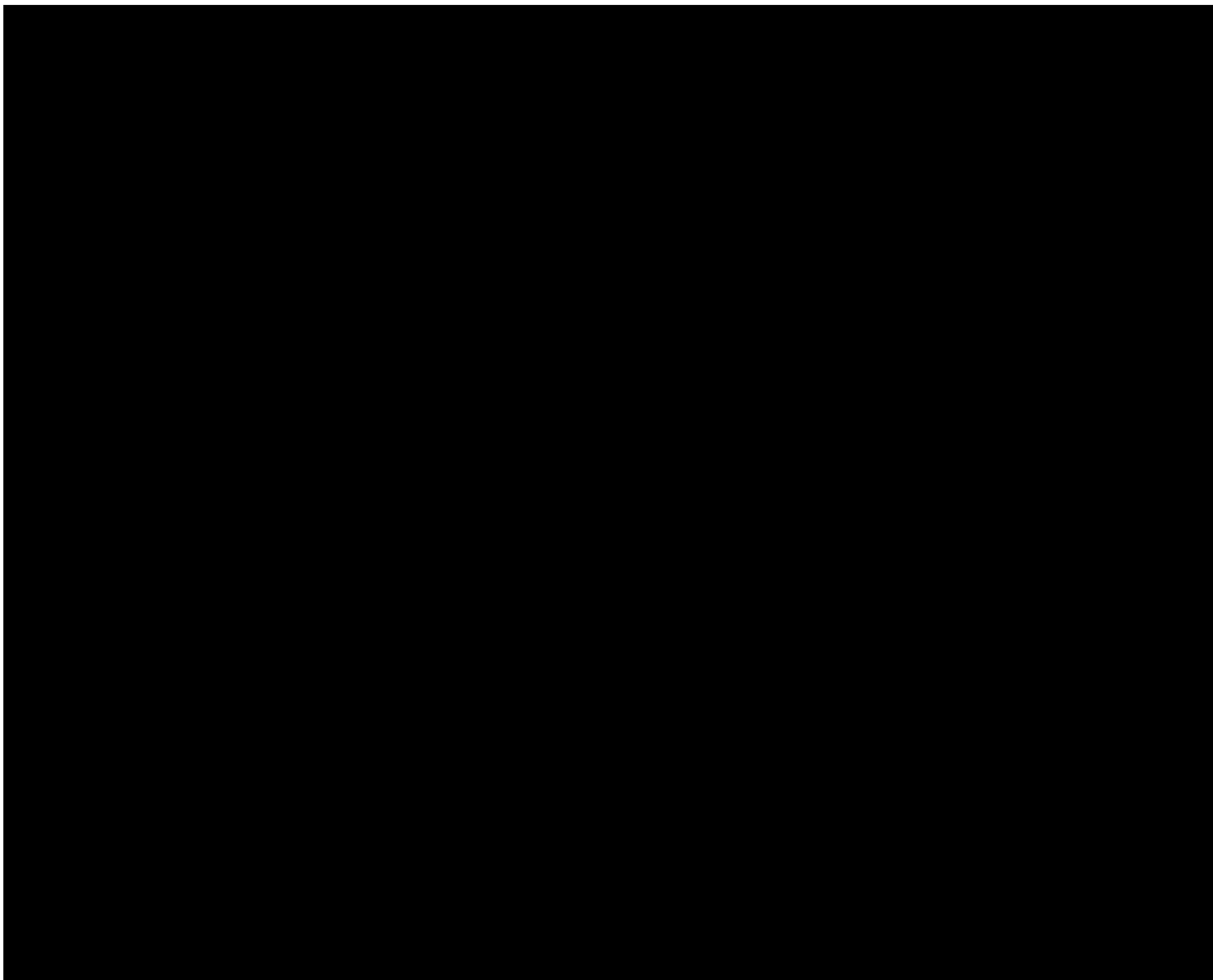
Mobility incorporates its Preliminary Statement and General Objections set forth above as though set forth fully herein. Mobility objects to this interrogatory to the extent that it seeks to elicit information subject to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other applicable privilege or immunity. Mobility further objects to this interrogatory to the extent it calls for a legal conclusion or presents a question of law. Additionally, Mobility objects to the extent that this interrogatory seeks information and/or documents that are outside of Mobility's possession, custody or control, including information regarding products manufactured, sold, or used by non-parties to this Action.

To the extent this interrogatory calls for Mobility's contentions or expert testimony or opinion, Mobility objects that this interrogatory is premature in light of the Court's February 2, 2011 Scheduling Order directing the parties to submit opening expert reports on November 4, 2011. Mobility is still investigating the claims and defenses at issue in this case. Mobility will provide responses regarding its contentions on the timeframe set by the Court, after it has had an opportunity to seek discovery regarding its contentions.

CONFIDENTIAL BUSINESS INFORMATION SUBJECT TO PROTECTIVE ORDER

Subject to and without waiving the foregoing general and specific objections, Mobility responds that, upon information and belief, Mobility is not currently aware of any product marked with any of the Mobility Patents-in-Suit.

Mobility has not yet completed its discovery and investigation of the facts relating to this interrogatory. Mobility will supplement this response at the appropriate time and as its investigation continues, in accordance with Federal Rule of Civil Procedure 26(e) and the schedule ordered by the Court.



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 8, 2011, I served the foregoing document via electronic mail on all counsel of record identified on the attached Service List.

*/s/ Mark D. Baker*

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Mark D. Baker