

REDACTED - PUBLIC VERSION

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:10cv023580-Civ-RNS

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 SUPPLEMENTAL OBJECTIONS AND RESPONSES TO MOTOROLA
MOBILITY AND MOTOROLA'S FIRST SET OF INTERROGATORIES**

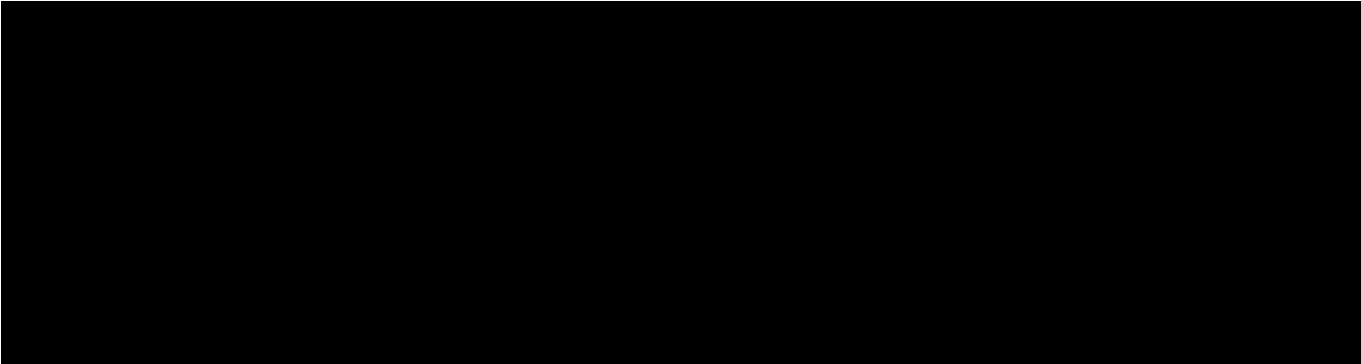
Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant and Counterclaim-Plaintiff Apple, Inc. ("Apple") objects and responds to the interrogatories served by Plaintiff and Counterclaim-Defendant Motorola Mobility, Inc. and Counterclaim-Defendant Motorola, Inc. (collectively "Motorola") as follows.

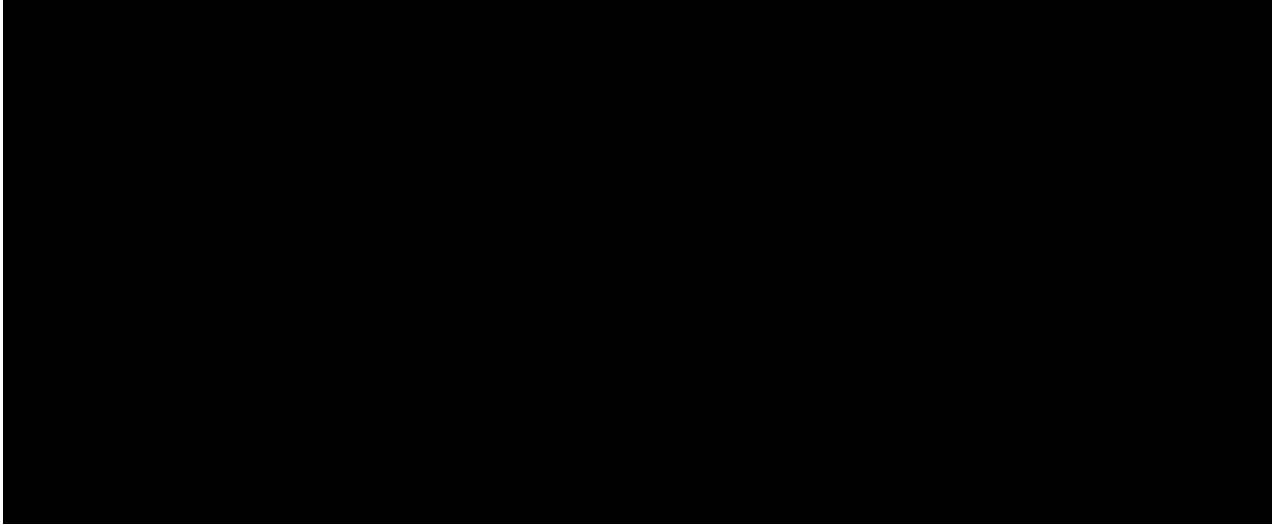
INTERROGATORY NO. 8

For each Apple Asserted Claim, separately identify, by product name, version, description and/or other identifying characteristic, every Embodying Product covered by the Apple Asserted Claim and describe, on an element-by-element basis, the basis for your contention, whether made now or in the past, that the product so identified practices the Apple Asserted Claim.

RESPONSE TO INTERROGATORY NO. 8

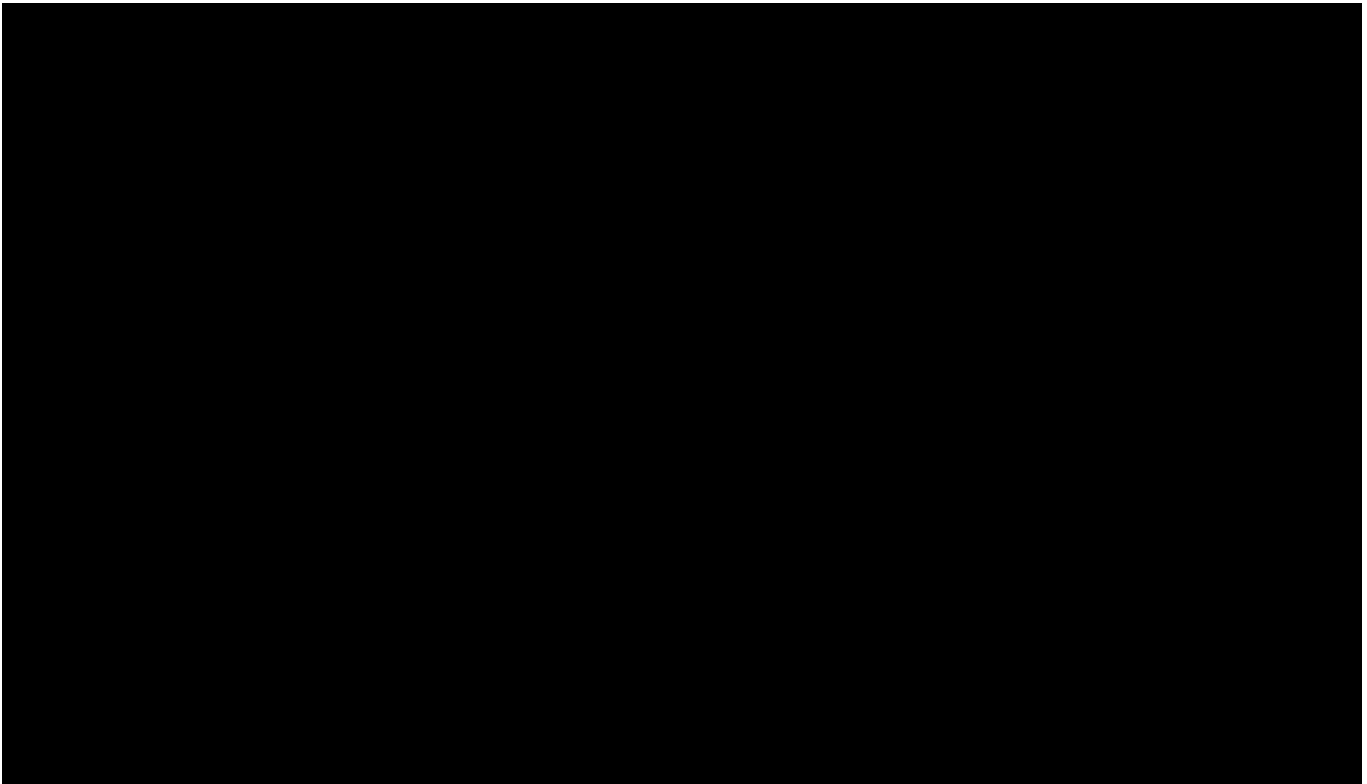
In addition to its General Objections, Apple objects to this interrogatory as unlimited in time and therefore overly broad and unduly burdensome to the extent that as defined by Counterclaim-Defendants, “Embodying Product(s)” requires Apple to provide an element-by-element analysis of every product ever made by any entity that is thought to embody an Apple Asserted Claim. Apple further objects to this interrogatory to the extent that it seeks information that is (a) confidential, proprietary, or trade secret; (b) subject to Apple’s legal or contractual obligation of nondisclosure or confidentiality to a third party; and/or (c) not within Apple’s possession, custody or control. Apple expressly reserves the right to amend, supplement, and/or correct its response to this interrogatory as additional information becomes available to Apple during the course of its discovery and investigation.





SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8

Subject to its General and Specific Objections, Apple identifies the following
Apple products that embody one or more of the Apple Asserted Patents:



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 17, 2012, I served the foregoing document via electronic mail on all counsel of record identified on the attached Service List.

/s/ Jill Ho
Jill Ho