

REDACTED - PUBLIC VERSION

EXHIBIT 4

**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 SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
MOTOROLA'S SECOND 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.

GENERAL OBJECTIONS

Apple hereby incorporates its General Objections to Defendants First Set of Interrogatories (Nos. 1-9) and the Definitions and Instructions therein.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

Subject to and without waiving the foregoing General Objections, Apple objects and responds to Motorola's interrogatories as follows:

INTERROGATORY NO. 11

Separately for each alleged invention claimed in the Apple Asserted Patents, describe the circumstances surrounding the first confidential disclosure, first written description, first manufacture, first public demonstration, use, or disclosure, and first sale or offer for sale of each such alleged invention, including without limitation identifying when, where, and to whom the alleged invention was first confidentially disclosed by an inventor of the Apple Asserted Patents or any other person; when the first written description occurred; when, where, by whom, and to whom any alleged invention related to each Apple Asserted Claim was first publicly demonstrated, used, disclosed, sold, and/or offered for sale, and all persons with knowledge of and documents concerning the information sought in this Interrogatory.

RESPONSE TO INTERROGATORY NO. 11

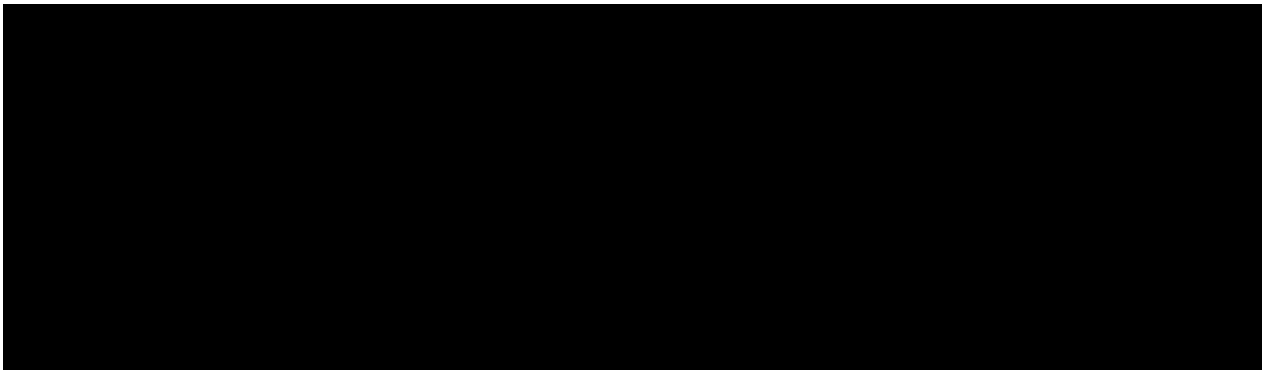
In addition to their General Objections, Apple objects to this interrogatory as vague and ambiguous, overly broad, and unduly burdensome. Apple further objects to this interrogatory to the extent that it seeks information that is (a) protected by the attorney-client privilege or work product doctrine; (b) confidential, proprietary, or trade secret; (c) subject to Apple's legal or contractual obligation of nondisclosure or

confidentiality to a third party; and/or (d) public or readily available to Defendants.

Apple further objects to the extent this interrogatory calls for a legal conclusion.

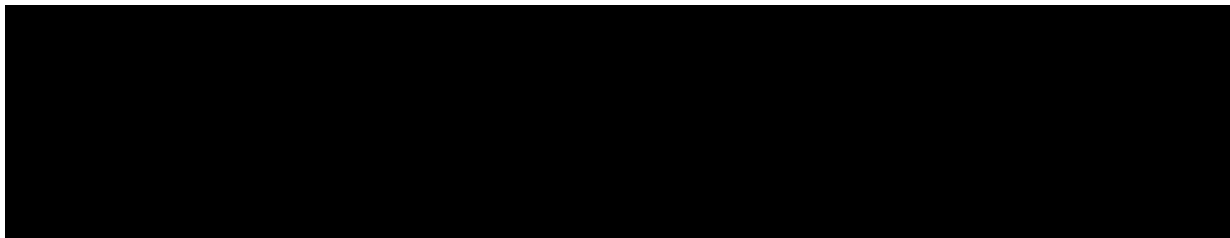
Plaintiffs further object to this interrogatory as vague and ambiguous in at least as far as it request “confidential disclosures.” Apple further objects to this interrogatory to the extent it requests information regarding events occurring later than one year prior to the filing date of any associated patent application. 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 their discovery and investigation, in response to any claim construction by the Court, or in response to Defendants’ infringement contentions (or any supplement thereto) or Defendants’ response to Apple’s interrogatories (or any supplement thereto).

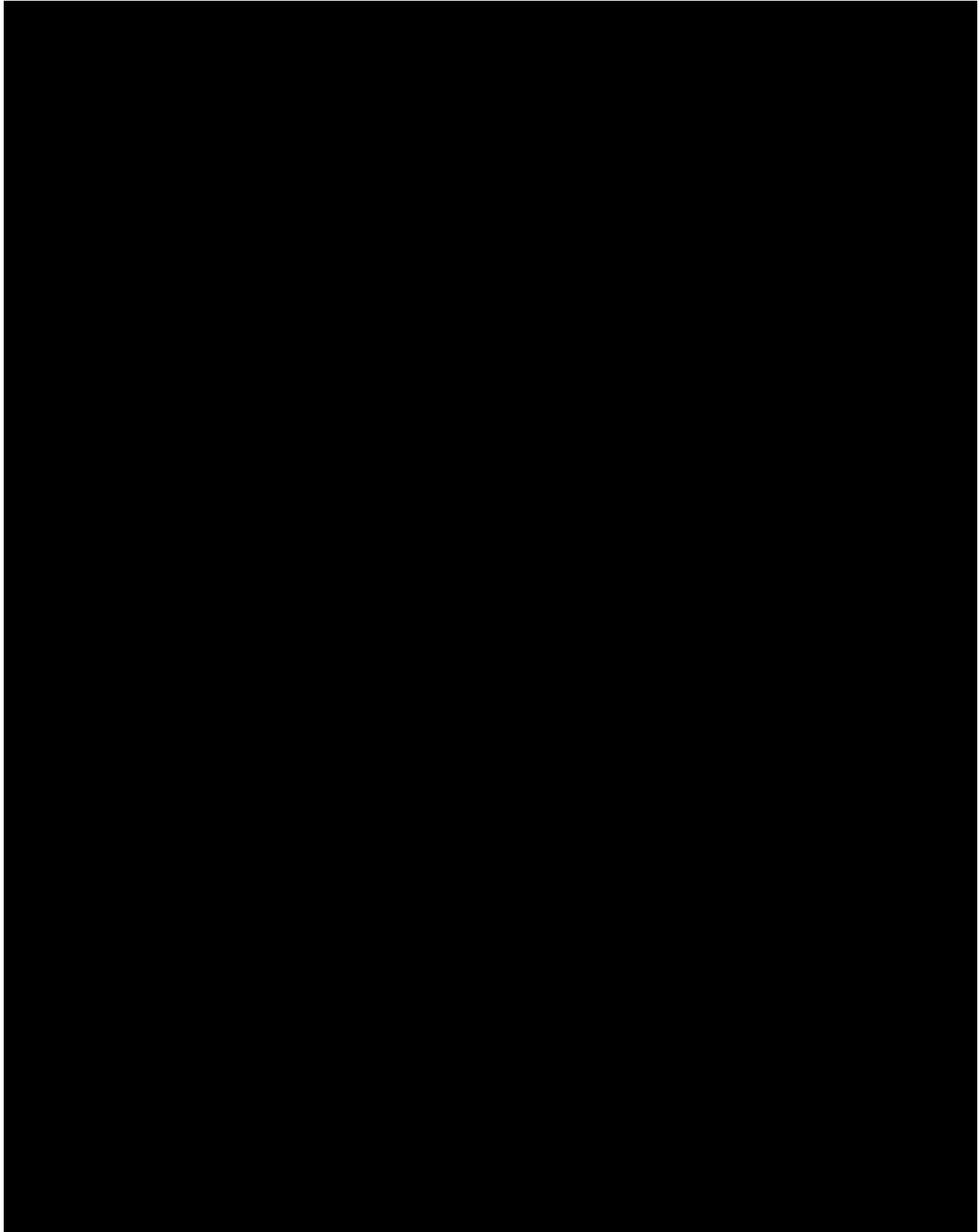
Subject to their General and Specific Objections, Apple responds as follows:

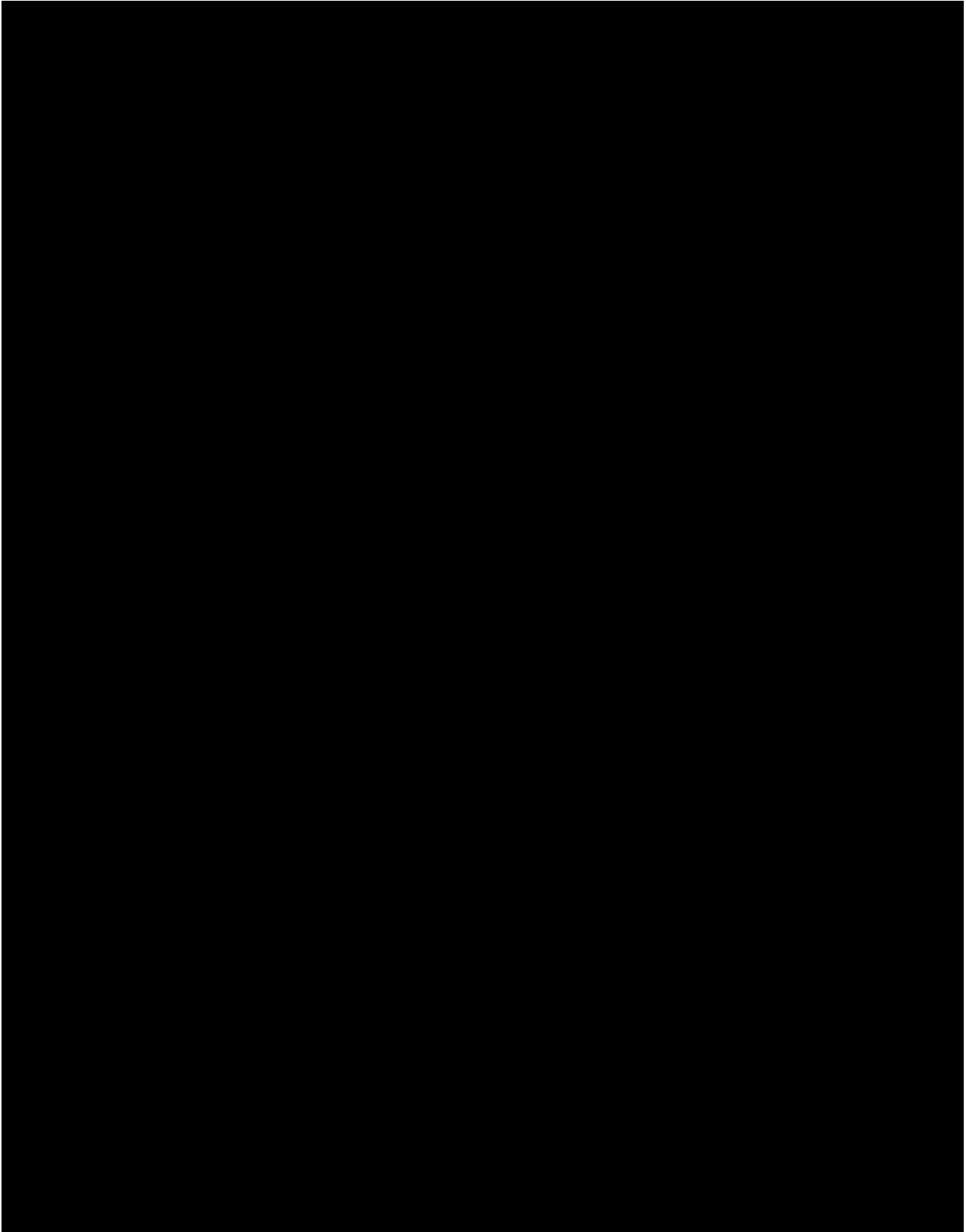


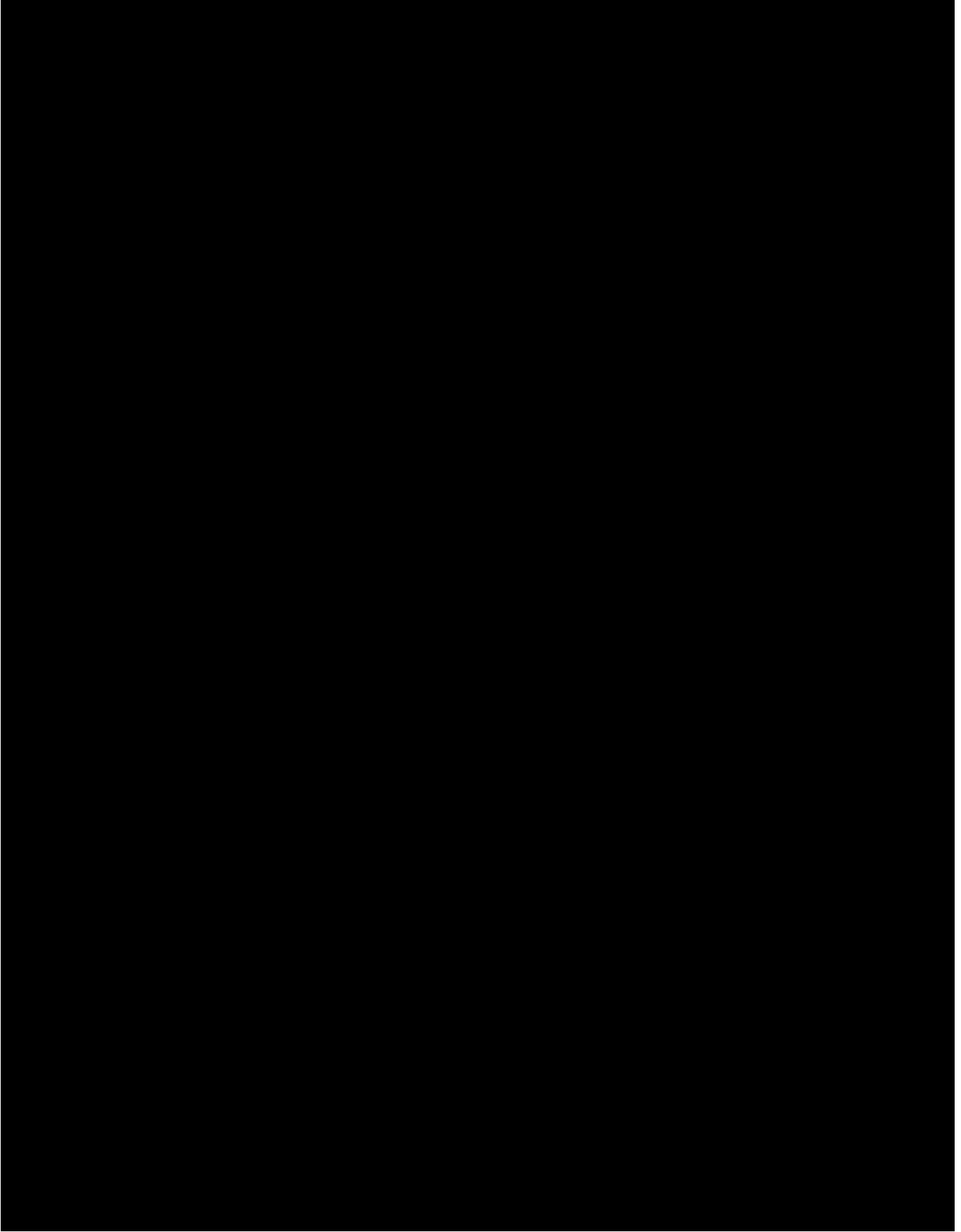
SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11

Subject to its General and Specific Objections, Apple further responds as follows:









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