EXHIBIT 6

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VIA E-MAIL

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Re: Motorola Mobility, Inc. v. Apple Inc., 10-cv-3580

Dear Jill:

I write in response to your October 31, 2011 letter regarding discovery.

First, Apple states that Motorola has refused to produce documents in response to Apple's Requests for Production Nos. 13, 23, and 47-49. To the contrary, Motorola has responded appropriately to each of these Requests:

1. RFP No. 13 seeks "[a]ll documents concerning, supporting, or contradicting the level of ordinary skill that You allege pertains to each of the Motorola Mobility Patents-in-Suit." As mentioned in Motorola's objections, this RFP is not reasonably calculated to lead to the discovery of admissible evidence, likely involves privileged information, is vague and ambiguous, and was premature when propounded at the beginning of discovery. Motorola, however, remains willing to meet and confer to clarify the meaning of this RFP in order to allow the parties to proceed with discovery.

2. RFP No. 23 seeks information relating to the initial use, sale and manufacture of "each embodiment of any invention claimed" in the patents-in-suit. Motorola properly objected to this extremely broad request as being, *inter alia*, overly broad, unduly burdensome, and premature when propounded at the beginning of discovery. Nevertheless, Motorola

has identified representative products that embody one or more of its patent claims, including the products listed on pages 49 and 81 of Motorola's technology tutorial filed with the Court. Motorola is in the process of reviewing its documents and, subject to all of its objections, will produce non-privileged documents responsive to RFP No. 23.

3. RFP No. 47 seeks information on all "documents and things concerning Your pleadings," while RFP No. 48 request the production of all "documents and things concerning Your responses to Apple's Interrogatories." Both of these RFPs were properly objected to as overly broad, unduly burdensome, and as seeking the disclosure of information protected under the attorney client privilege and/or the doctrine of attorney work product. Nevertheless, Motorola remains willing to meet and confer with Apple to delineate the proper scope and boundaries of these RFPs in order to allow the parties to proceed with discovery.

4. RFP No. 49 requests the production of "[a]ll documents and things concerning the assignment or ownership of the Motorola Mobility Patents-in-Suit," information that Motorola has already produced *en masse* in this litigation and/or other litigations between Motorola and Apple. Motorola is, however, in the process of reviewing its documents and, subject to all of its objections, will supplement its production with non-privileged documents responsive to RFP No. 49.

Second, Apple takes exception to Motorola's inability to decipher certain Apple RFPs and demands that Motorola "clarify [its] understanding and identify what questions [it] ha[s]…concerning scope." But it is not Motorola's burden to rephrase Apple's discovery requests so as to render them comprehensible. Moreover, Motorola has made it very clear in its responses that it would produce relevant responsive documents to the extent it was able to understand the requests. If Apple deems Motorola's efforts to be insufficient, it should reconsider its rejection (in subsection A(4) of its October 31 letter) of Motorola's proposal to meet and confer in order to narrow its unduly broad discovery requests.

Third, Apple challenges Motorola's contention that many of Apple's requests for production were premature when first propounded in this case. But Motorola's responses made it very clear that it would produce relevant, non-privileged responsive documents at an appropriate time. Motorola has done, and continues to do, just that. Motorola is in the process of reviewing its documents and will continue to produce non-privileged, relevant documents on a rolling basis. Specifically, Motorola intends to produce, subject to its objections, non-privileged documents responsive to RFPs 11, 18 (for the aforementioned representative products that Motorola has identified), 19 (for those same representative products), and 25-26.

Fourth, Motorola's interrogatory responses expressly and properly reserved the right to continue to supplement these interrogatories in accordance with Federal Rule of Civil Procedure Rule 26(e) and the Court-ordered schedule. In any event, Motorola continues to review the subject matter of these requests and will supplement its interrogatory responses with non-privileged, responsive and relevant information as appropriate. In particular, Motorola will, subject to all of its objections, supplement its responses to Apple's interrogatories as needed, including Interrogatories Nos. 3, 7, 8, and 12-15. We likely will not be able to do so by Apple's unilateral November 11 deadline.

Finally, Motorola notes that Apple owes Motorola responses to similar interrogatories, including Motorola Interrogatory No. 8, which seeks information on embodiments of the asserted Apple patents (which Apple only partially answered, with a promise to supplement) and No. 11, which seeks information on the first sale, use and manufacture of the alleged inventions disclosed in the Apple patents (for which Apple provided no substantive response). Motorola requests that Apple update its own answers to Motorola's interrogatories to reflect any and all information that Apple has collected during discovery.

Very truly yours,

/s/

David Perlson