

EXHIBIT 8

DiMuzio, Elena

From: DiMuzio, Elena
Sent: Tuesday, November 15, 2011 11:35 AM
To: Ben Quarmby; Ho, Jill
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; AppleCov
Subject: RE: Apple/Motorola (FL) - Discovery

Ben,

Here is a list of issues we would like to address on the call today.

1. RFPs: Motorola should confirm that it has actually produced documents in response to all of Apple's RFPs, and if not, should commit to producing them within 2 weeks of today. In particular, we would like Motorola to confirm that it has actually searched for and produced documents on the following requests: 6, 7, 9, 22-24, 26, 27, 30, 32-36, 38 and 39.

For all requests asking Motorola to identify its own products that practice its asserted patents, it is insufficient for Motorola to identify only "representative" products (as stated in the November 8, 2011 letter). Because this issue impacts the damages Motorola can claim, Motorola bears the burden to show that it has complied with its marking obligations. Thus, Motorola must identify *all* of its products that have ever practiced any of its asserted patents. Motorola must also produce financial information relating to sales of those products (see, e.g., RFP 9) and indicate whether it has marked these products with its patents (Interrogatory 13).

For all requests to which Motorola has limited its response based on its failure to understand the request, please be prepared to identify what is confusing so we can resolve the confusion today.

2. Interrogatories: Motorola should confirm when it will provide substantive responses to the interrogatories it has not yet responded to. This information is needed before the upcoming 30(b)(6) depositions. This includes interrogatories 7,8,14 and 15.

Likewise, Motorola should state when it will supplement its interrogatory responses 3, 6, 12 and 13.

3. 30(b)(6) depositions: Motorola should be prepared to discuss the basis for its refusal to produce any witness for topics 6, 8, 19- 21, 28, 31-33, 35-40, 46, 52-53, 63, and 65-66. We requested this information in our November 2, 2011 letter, but your November 9, 2011 response did not address this request.

Talk to you soon.

Regards,

Elena.

Elena DiMuzio | Associate | **COVINGTON & BURLING LLP**
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From: Ben Quarmby [mailto:benquarmby@quinnemanuel.com]
Sent: Monday, November 14, 2011 12:53 PM
To: Ho, Jill

Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; AppleCov
Subject: RE: Apple/Motorola (FL) - Discovery

Jill –

Please find below a list of the issues that Motorola believes need to be addressed during tomorrow's meet and confer:

1. Responses to RFPs
 - a. Apple's refusal to produce documents relating to iCloud, Fairplay, the App Store, iTunes, and iPhone 4S.
2. Production of Source Code
 - a. Apple's refusal to produce source code relating to iCloud, Fairplay, the App Store, iTunes and the Apple 4S.
3. Responses to Interrogatories
 - a. Apple's supplementation of answers to Motorola interrogatories, including Nos. 1, 5, 8, 9, 11-15.
4. Identification of Apple 30(b)(6) Witnesses
 - a. Apple's failure to identify any witnesses to date.
5. Potential Agreement re: Foregoing Deposition of Inventors Not to be Called at Trial
6. Depositions of Terri Hughes and Anthony Sarli
7. Apple Subpoenas to Third Parties

Best regards,

Ben Quarmby

From: Ho, Jill [mailto:jill.ho@weil.com]
Sent: Thursday, November 10, 2011 9:47 PM
To: Ben Quarmby
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; 'AppleCov@cov.com'
Subject: RE: Apple/Motorola (FL) - Discovery

Hi Ben,

Yes, it was our understanding that we were going to meet and confer on all the issues raised in our recent correspondence (regarding both Apple's and Motorola's discovery responses). Tuesday at 1pm works on our end. Please circulate a dial-in when you get a chance.

Thanks in advance,
Jill

From: Ben Quarmby [mailto:benquarmby@quinnemanuel.com]
Sent: Thursday, November 10, 2011 2:56 PM
To: Ho, Jill
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; 'AppleCov@cov.com'
Subject: RE: Apple/Motorola (FL) - Discovery

Hi Jill –

If Apple agrees to address all outstanding discovery issues identified in the parties' recent correspondence during the meet and confer, we are prepared to push it back until Tuesday November 15 at 1 pm (PT). Please let us know whether that works for you.

Best regards,

Ben Quarmby

From: Ho, Jill [mailto:jill.ho@weil.com]
Sent: Thursday, November 10, 2011 5:14 PM
To: Ben Quarmby
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; 'AppleCov@cov.com'
Subject: RE: Apple/Motorola (FL) - Discovery

Hi Ben,

Not all of the attorneys who need to participate on our end are available tomorrow. Are you and David available to meet and confer on Tuesday?

Best regards,
Jill

From: Ben Quarmby [mailto:benquarmby@quinnemanuel.com]
Sent: Thursday, November 10, 2011 12:23 PM
To: Ho, Jill
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; 'AppleCov@cov.com'
Subject: RE: Apple/Motorola (FL) - Discovery

Jill –

We are available for a meet and confer tomorrow, Friday November 11 at 1.30 pm (PT). We would like to take this opportunity to address all outstanding discovery issues addressed in the recent correspondence between the parties. Please let us know whether that works for you.

Best regards,

Ben Quarmby

From: Ho, Jill [mailto:jill.ho@weil.com]
Sent: Thursday, November 10, 2011 2:40 PM
To: Ben Quarmby
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; 'AppleCov@cov.com'
Subject: RE: Apple/Motorola (FL) - Discovery

Hi Ben/David,

Are you available on Tuesday, November 15th to meet and confer about this letter as well as your November 8 letter to me?

Best regards,
Jill

From: Ben Quarmby [mailto:benquarmby@quinnemanuel.com]
Sent: Wednesday, November 09, 2011 2:25 PM

To: Ho, Jill
Cc: Moto-Apple-SDFL; Weil_TLG Apple Moto FL External; 'AppleCov@cov.com'
Subject: RE: Apple/Motorola (FL) - Discovery

Jill –

Please see the attached correspondence.

Best regards,

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