

EXHIBIT K

From: Schmidt, Jill
Sent: Friday, February 10, 2012 12:13 PM
To: Marshall Searcy (marshallsearcy@quinnemanuel.com); David Perlson (davidperlson@quinnemanuel.com); Moto-Apple-SDFL (Moto-Apple-SDFL@quinnemanuel.com)
Cc: Weil_TLG Apple Moto FL External; AppleCov@cov.com
Subject: RE: Apple/Motorola (FL): individual depositions

Hi Marshall,

Please let me know whether Motorola intends to call any of the other individuals listed in its initial disclosures at trial and, if so, please provide deposition dates. In addition, please answer my question with regard to whether Chuck Supinski, Joe Murray, Mike DiFiglia, Lou Fodor, Nathan Mengel, and Scott Sellers are still employed by Motorola. If they are, we would like to depose them even if Motorola does not intend to call them at trial.

In addition, please let me know if Greg Schladt is available any earlier than March 7. Since Judge Scola has set a tutorial for March 8-9, March 7 will be very difficult for us.

Thanks,
Jill

From: Schmidt, Jill
Sent: Wednesday, February 08, 2012 9:34 AM
To: Marshall Searcy (marshallsearcy@quinnemanuel.com); David Perlson (davidperlson@quinnemanuel.com); Moto-Apple-SDFL (Moto-Apple-SDFL@quinnemanuel.com)
Cc: Weil_TLG Apple Moto FL External; AppleCov@cov.com
Subject: RE: Apple/Motorola (FL): individual depositions

Hi Marshall,

On January 18, you said you expected to provide deposition dates for Motorola's 30(b)(6) designees on Topics 59-62 "early next week." On January 27, that became "very shortly." I have been asking you to identify Motorola's witnesses and deposition dates for those specific topics since December 9, yet you continue to ignore my requests. While I appreciate that it takes time to coordinate everyone's schedules, Motorola has been dragging its feet on providing depositions of its technical witnesses for almost two months now, which is severely hampering Apple's ability to prepare its case. We need to know who these witnesses are, whether their document production is complete, and when they are available for deposition. Please provide this information by the end of the day.

In addition, if Chuck Supinski, Joe Murray, Mike DiFiglia, Lou Fodor, Nathan Mengel, and Scott Sellers are still employed by Motorola, please provide deposition dates as soon as possible. If not, please let me know if Quinn represents them.

Thank you,
Jill

From: Schmidt, Jill
Sent: Monday, February 06, 2012 3:59 PM
To: Marshall Searcy (marshallsearcy@quinnemanuel.com); David Perlson (davidperlson@quinnemanuel.com); Moto-Apple-SDFL (Moto-Apple-SDFL@quinnemanuel.com)

Cc: Weil_TLG Apple Moto FL External; AppleCov@cov.com
Subject: RE: Apple/Motorola (FL): individual depositions

Hi Marshall / David,

Please provide deposition dates before March 1 for the witnesses below or let me know when you are available to meet and confer tomorrow.

Best regards,
Jill



Jill Schmidt (née Ho)

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From: Schmidt, Jill
Sent: Friday, February 03, 2012 8:11 AM
To: Marshall Searcy (marshallsearcy@quinnemanuel.com); David Perlson (davidperlson@quinnemanuel.com); Moto-Apple-SDFL (Moto-Apple-SDFL@quinnemanuel.com)
Cc: Weil_TLG Apple Moto FL External; AppleCov@cov.com
Subject: RE: Apple/Motorola (FL): individual depositions

Hi Marshall / David,

Please respond to my email and let me know when these individuals are available for deposition. We are also still waiting for Motorola to designate technical witnesses for Topics 59-62 of Apple's 30(b)(6) notice.

Thanks,
Jill



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From: Ho, Jill
Sent: Thursday, January 26, 2012 6:20 PM
To: Marshall Searcy (marshallsearcy@quinnemanuel.com); David Perlson (davidperlson@quinnemanuel.com); Moto-Apple-SDFL (Moto-Apple-SDFL@quinnemanuel.com)
Cc: Weil_TLG Apple Moto FL External; AppleCov@cov.com
Subject: Apple/Motorola (FL): individual depositions

Hi Marshall / David,

I write to follow up on this question from my November 16, 2011 letter to your former colleague, Ben Quarmby. Please let me know whether Motorola intends to call to trial any of the following witnesses listed in its initial disclosures: Kirk Dailey, Chris Collins, Peter Prunuske, Marjorie Silha, Steven Fischer, David Briggs, Jeanette Orlen, Gregory Schladt, Paul Martinson, Warren Fernandez, Jim Conroy, Amy Verbeke, Gunjan Shah, Sandy Baek, Jaime Wheeler, Allison Yi, Jeff Snow, Lawrence Robinson, John Kamieniecki, Richard Rementilla, Robert Simons, and John Tracy. If so, please provide deposition dates for those witnesses immediately.

In addition, it appears that Chuck Supinski, Joe Murray, Mike DiFiglia, Lou Fodor, Nathan Mengel, and Scott Sellers may have knowledge regarding Motorola's testing of IPGs/EPGs on its set-top boxes. Please let me know if these individuals are still employed by Motorola and, if not, whether Quinn represents them.

Thanks,
Jill



Jill Ho

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