

EXHIBIT U

From: Matt Korhonen <mattkorhonen@quinnemanuel.com>
Sent: Friday, February 24, 2012 4:59 PM
To: Schmidt, Jill
Cc: Moto-Apple-SDFL; AppleCov; Apple Moto Weil
Subject: Motorola v. Apple

Hi Jill,

During our meet and confer this morning, you stated that Motorola had failed to identify a witness for Topic No. 10 as it relates to the products that Apple accuses of infringing the '849, '646, and '116 Patents. I followed up on this and have determined that Motorola has already complied with its discovery obligations for Topic No. 10 with regard to those products. At least as early as February 1, 2012, Motorola designated Ann Deardorff's prior testimony in satisfaction of Topics 8-10. In response, you indicated that previous testimony was insufficient for Topic Nos. 8 and 9, but not Topic 10 (please see the attached). In addition, you failed to object to our designation of Ms. Deardorff's prior testimony for Topic No. 10 in any of the subsequent meet and confer calls. Accordingly, we believe that any objections to her testimony have already been waived. In any event, despite the prior testimony designation, Apple questioned Ms. Deardorff about supplier agreements again during her deposition today. Motorola's designations were clear, Ms. Deardorff's deposition was today, and we consider this issue resolved.

In addition, Mr. Prezuhy is no longer available for deposition on March 1, 2012. Mr. Richard Rementilla is available on March 16 and will be testifying in both his individual capacity and on the Topics for which Mr. Prezuhy was previously designated. Please confirm this date.

Finally, Mr. Larry Robinson is available for deposition in his individual capacity on March 14, 2012. Please confirm this date as well.

Thanks,

Matthew Korhonen | Quinn Emanuel Urquhart & Sullivan, LLP | 865 S. Figueroa Street, 10th Floor, Los Angeles, CA 90017

Direct: +1.213.443.3303 | Main Phone: +1.213.443.3000 | Main Fax: +1.213.443.3100 | E-mail:

mattkorhonen@quinnemanuel.com

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.