

**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.

**DECLARATION OF CATHLEEN GARRIGAN IN SUPPORT OF MOTOROLA'S
MOTION TO COMPEL RULE 30(b)(6) DEPOSITION TESTIMONY FROM APPLE**

I, Cathleen G. Garrigan, declare:

I am a member of the bar of the State of California, admitted *pro hac vice* in this action and an associate with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Motorola Mobility, Inc. and Motorola Solutions, Inc. (f/k/a Motorola, Inc.) (collectively "Motorola"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently to the matters contained in this declaration.

1. Attached hereto as Exhibit A is a true and correct copy of Motorola Mobility Inc.'s Notice of Deposition of Apple Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6), which was served on July 27, 2011.

2. Attached hereto as Exhibit B is a true and correct copy of excerpts of the February 16, 2012 deposition transcript of Dr. Cristobal Baray.

3. Attached hereto as Exhibit C is a true and correct copy of an excerpt of Exhibit F to Motorola Mobility Inc.'s Preliminary Infringement Contentions, served on May 18, 2011.

4. Attached hereto as Exhibit D is a true and correct copy of Motorola Mobility Inc. and Motorola, Inc.'s First Set of Requests for Production to Apple Inc. (Nos. 1-88), served on December 29, 2010.

5. Attached hereto as Exhibit E is a true and correct copy of Apple's Objections and Responses to Motorola Mobility and Motorola's First Set of Requests for Production (Nos. 1-88), served on January 31, 2011.

6. Attached hereto as Exhibit F is a true and correct copy of a February 6, 2012 email from Christine Haskett to Matthew Korhonen.

7. Attached hereto as Exhibit G is a true and correct copy of a February 1, 2012 email from Matthew Korhonen to Christine Haskett.

8. Attached hereto as Exhibit H is a true and correct copy of a February 6, 2012 email from Christine Haskett to Matthew Korhonen.

9. Attached hereto as Exhibit I is a true and correct copy of a February 7, 2012 email from Christine Haskett to Matthew Korhonen.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9th day of March 2012 at San Francisco, California.



Cathleen G. Garrigan