

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

**MOTOROLA MOBILITY, INC. AND MOTOROLA, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION TO APPLE INC. (NOS. 1-88)**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff/Counterclaim Defendant Motorola Mobility, Inc. ("Mobility") and Counterclaim Defendant Motorola, Inc. ("Motorola") (collectively, "Counterclaim-Defendants") request that Defendant Apple Inc. respond fully and in writing to this First Set of Requests for the Production of Documents and Things ("Requests") and produce the documents and things requested herein in accordance with the following instructions and definitions at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor New York, NY 10010 within thirty (30) days from the date of service of these Requests.

DEFINITIONS & INSTRUCTIONS

Counterclaim-Defendants repeat and incorporate hererin by reference all of the Definitions contained in their First Set of Interrogatories to Apple served concurrently with these Requests.

1. In answering the following Requests, furnish all available information, including information in the possession, custody, or control of any of Apple's attorneys, directors, officers, agents, employees, representatives, associates, investigators or division affiliates, partnerships, parents or subsidiaries, and persons under Apple's control, who have the best knowledge, not merely information known to Apple based on Apple's own personal knowledge. If you cannot fully respond to the following Requests after exercising due diligence to secure the information requested thereby, so state, and specify the portion of each Request that cannot be responded to fully and completely. In the latter event, state what efforts were made to obtain the requested information and the facts relied upon that support the contention that the Request cannot be answered fully and completely; and state what knowledge, information or belief Apple has concerning the unanswered portion of any such Request.

2. All documents must be produced in accordance with the requirements of Federal Rule of Civil Procedure 34.

3. Electronic records and computerized information must be produced in an intelligible format, together with a description of the system from which they were derived sufficient to permit rendering the records and information intelligible.

4. Selection of documents from the files and other sources and the numbering of such documents shall be performed in such a manner as to ensure that the source of each document may be determined, if necessary.

5. File folders with tabs or labels or directories of files identifying documents must be produced intact with such documents.

6. Documents attached to each other shall not be separated.

7. If you object to fully identifying a document, electronically stored information or oral communication because of a privilege, you must nevertheless provide the following information unless divulging the information would disclose the privileged information:

- (a) the nature of the privilege claimed (including work product);
- (b) if the privilege is being asserted in connection with a claim or defense governed by state law, the state privilege rule being invoked;
- (c) the date of the document, electronically stored information or oral communication;
- (d) if a document, the type of document (e.g., letter or memorandum) and, if electronically stored information, the software application used to create it (e.g., MS Word or MS Excel Spreadsheet), and the custodian, location, and such other information sufficient to identify the material for a subpoena duces tecum or a production request, including where appropriate the author, the addressee, and, if not apparent, the relationship between the author and addressee;
- (e) if an oral communication: the place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and
- (f) the general subject matter of the document, electronically stored information or oral communication.

8. You are under a continuous obligation to supplement your answers to these requests under the circumstances specified in Federal Rule of Civil Procedure 26(e).

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1.

All documents concerning this Action.

REQUEST FOR PRODUCTION NO. 2.

All documents concerning each of the Apple Asserted Patents, the Subject Matter thereof, or any Related Applications.

REQUEST FOR PRODUCTION NO. 3.

All documents concerning the research and development of the Subject Matter described in each of the Apple Asserted Patents, including without limitation laboratory notebooks, schematics, drawings, specifications, source code, artwork, formulas, and prototypes.

REQUEST FOR PRODUCTION NO. 4.

All documents concerning the first public use in the United States, first offer for sale or first sale in the United States, or first public disclosure of any Subject Matter claimed in each of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 5.

All documents and things concerning the preparation and prosecution of the patent applications for the Apple Asserted Patents or Related Applications, including without limitation draft applications, invention disclosures, search reports, all Prior Art whether cited in such applications or not, all copies of the file histories marked or annotated by Apple or the inventors, and other materials prepared for sending to the U.S. Patent and Trademark Office, papers sent to

or received from the U.S. Patent and Trademark Office, notes and memoranda of interviews (telephone or in person), correspondence, and attorney time records and bills.

REQUEST FOR PRODUCTION NO. 6.

All documents and things sent to or received from any patent agent, attorney, agent or representative of Apple concerning any of the Apple Asserted Patents or any Related Applications.

REQUEST FOR PRODUCTION NO. 7.

All documents and things exchanged with or in the possession of the prosecuting attorney(s) of each of the Apple Asserted Patents or Related Applications, or any attorney or agent or representative involved in the application process for each of the Apple Asserted Patents or Related Applications, which concern the Apple Asserted Patents or Related Applications, including without limitation documents and things concerning the prosecution of the Apple Asserted Patents or Related Applications or assignment of any rights in the Apple Asserted Patents or Related Applications.

REQUEST FOR PRODUCTION NO. 8.

All documents and things in the possession of any of the inventors of any of the Apple Asserted Patents concerning the Apple Asserted Patents or Related Applications, including without limitation documents and things concerning the Subject Matter of the Apple Asserted Patents, prosecution of the Apple Asserted Patents, or assignment of any rights in the Apple Asserted Patents or Related Applications.

REQUEST FOR PRODUCTION NO. 9.

All invention disclosures or other records, documents and things concerning the first conception of the alleged invention(s) covered by any of the Apple Asserted Patents or Related Applications.

REQUEST FOR PRODUCTION NO. 10.

All documents and things concerning the reduction to practice of any alleged invention(s) covered by any of the Apple Asserted Patents, and all documents and things concerning any alleged diligence in reducing to practice the alleged invention(s) covered by any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 11.

All documents showing the individual contribution of each inventor of the Apple Asserted Patents to the conception, design, development, diligence, or reduction to practice of the subject matter of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 12.

All documents that show any modes contemplated by any of the inventors for carrying out each invention claimed in each of the Apple Asserted Patents, including the best mode of carrying out the inventions claimed in each of the Apple Asserted Patents or related applications (as this phrase is used in 35 U.S.C. § 112, 1st Paragraph).

REQUEST FOR PRODUCTION NO. 13.

All documents and things concerning any agreement between Apple and any of the named inventors of the Apple Asserted Patents, including but not limited to any assignment, contract, employment agreement or license.

REQUEST FOR PRODUCTION NO. 14.

All communications and correspondence between Apple and the named inventors of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 15.

All documents concerning the scope, validity, or enforceability of any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 16.

All documents concerning any secondary consideration or other objective evidence of non-obviousness of the Apple Asserted Claims, including commercial success, long-felt need, commercial acquiescence, expressions of skepticism, copying, teaching away, failed attempts by others, or simultaneous development and any nexus between such secondary consideration or other objective evidence of non-obviousness and the Apple Asserted Claims.

REQUEST FOR PRODUCTION NO. 17.

All documents and things concerning Apple's contention as to what constituted the level of skill of a person of ordinary skill in the art to which the subject matter of each of the Apple Asserted Patents pertains, at the time of filing with the U.S. Patent and Trademark Office the original application resulting in each Apple Asserted Patent.

REQUEST FOR PRODUCTION NO. 18.

All documents and things concerning any Prior Art relating to the Apple Asserted Patents, including any document or thing identified as potential Prior Art to Apple by any third party.

REQUEST FOR PRODUCTION NO. 19.

All documents and things concerning patents, publications, abstracts, papers, articles, presentations, or speeches invented, authored or given, in whole or in part, by any of the inventors of the Apple Asserted Patents concerning the Subject Matter of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 20.

All documents concerning prior testimony of any of the inventors of the Apple Asserted Patents in the context of any adversarial proceeding in the United States or abroad.

REQUEST FOR PRODUCTION NO. 21.

Documents sufficient to show all United States and foreign patents, and all United States and foreign patent applications, where any named inventor of the Apple Asserted Patents is listed as a named inventor.

REQUEST FOR PRODUCTION NO. 22.

Each document concerning any search or study that relates to patentability, unpatentability, validity, invalidity, scope, infringement, non-infringement, enforceability, or unenforceability of one or more Apple Asserted Patents or claim thereof, or any Related Application.

REQUEST FOR PRODUCTION NO. 23.

All documents relating to the payment of maintenance fees to the United States Patent and Trademark Office for the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 24.

All documents concerning any errors or potential errors in any of the Apple Asserted Patents, including without limitation documents concerning any awareness of such errors or

potential errors by Apple, any of the inventors, or anyone acting on their behalf, prior to the issuance of each of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 25.

Documents sufficient to identify the steps that Apple has taken to ensure that products, software, processes, systems, methods, machines, or services covered by any of the Apple Asserted Patents, under license or otherwise, are adequately marked with each such patent.

REQUEST FOR PRODUCTION NO. 26.

All documents and things concerning the research, design, development, manufacture, testing, operation, performance, installation, marketing, use, or sale of any Embodying Products by Apple, including without limitation a copy of all source code, documentation, and design notes, instruction manuals, service manuals, schematics, customer instruction sheets or brochures, product specifications, data sheets, product announcements, press releases, text of explanatory articles, speeches, lectures, or product roadmaps (including, without limitation, information electronically disseminated or made available).

REQUEST FOR PRODUCTION NO. 27.

All documents and things that refer or relate to any non-party's research, design, development, manufacture, testing, operation, assembly, packaging, use, testing, sampling, importation, sale, offer for sale, performance, or installation of any Embodying Products. This request includes, but is not limited to:

- a. all original and all revised documents evidencing process architecture, process flow, process recipe, specification, and all manufacturing documents, including travelers, procurement documents (including all invoices), requests for proposals, requests for quotations, and correspondence for all versions of any prototype;

- b. all prototypes, engineering models or other physical models used, constructed, or made during the design or development of any of the products; and
- c. all documents dated prior to, or which existed prior to, the filing date of the application for each of the Apple Asserted Patents, including all agreements providing for compensation or financing of any work performed in connection with the design or development of any product embodying the invention claimed in any claim of any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 28.

All documents and things concerning the infringement of any of the Apple Asserted Patents by any person.

REQUEST FOR PRODUCTION NO. 29.

All documents relating to the Accused Instrumentalities of Counterclaim-Defendants.

REQUEST FOR PRODUCTION NO. 30.

All documents and things upon which Apple intends to rely (including without limitation all attorney opinion letters and memoranda) to support the claims of patent infringement alleged against Counterclaim-Defendants.

REQUEST FOR PRODUCTION NO. 31.

All documents which you claim will have any bearing whatsoever on the interpretation or construction of any of the claims or terms in the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 32.

All documents and things concerning, reflecting, or constituting any communications or correspondence between Apple and any alleged infringer of any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 33.

All documents sufficient to show Apple's first awareness of Counterclaim-Defendants' activities that form the basis of any allegation that Counterclaim-Defendants infringe any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 34.

Any document relating to any contention Apple has made that Counterclaim-Defendants' infringement of any of the Apple Asserted Patents was or was not willful, intentional, or knowing.

REQUEST FOR PRODUCTION NO. 35.

Any document relating to any contention Apple has made that Counterclaim-Defendants did or did not knowingly contribute to the infringement of any of the Apple Asserted Patents or did or did not induce infringement of any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 36.

All documents and things that support, contradict, refute, or otherwise relate to Apple's allegations and contentions contained within its Complaint in this Action, including without limitation any documents supporting Apple's allegations that Counterclaim-Defendants have infringed or are infringing the Apple Asserted Patents, and any pre-litigation opinion letters or other documents concerning the same.

REQUEST FOR PRODUCTION NO. 37.

All documents concerning any legal or administrative proceedings to which Apple was a party that concerned any of the Apple Asserted Patents or Related Applications, or the Subject Matter of any of the Apple Asserted Patents, other than the present matter, including without limitation pleadings, court filings, court orders, special master reports, transcripts (whether trial,

hearing, or deposition), exhibits (whether trial, hearing, filing, or deposition), and descriptions of any product Apple contended infringed a patent.

REQUEST FOR PRODUCTION NO. 38.

Documents sufficient to demonstrate every person or entity who has now, or previously had, a financial interest in any of the Apple Asserted Patents or Related Applications, other than Apple.

REQUEST FOR PRODUCTION NO. 39.

All documents that refer or relate to any security interest in or lien against any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 40.

All documents concerning Apple's involvement with, investment in, or payment of any monies to any company from whom you acquired or obtained any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 41.

All communications concerning any one or more of the Apple Asserted Patents, including but not limited to communications between Apple and any third party.

REQUEST FOR PRODUCTION NO. 42.

All documents concerning communications and meetings between Apple and Counterclaim-Defendants regarding the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 43.

All documents concerning Apple business plans or meetings concerning any of the Apple Asserted Patents.

REQUEST FOR PRODUCTION NO. 44.

All documents concerning any practices or policies of Apple concerning pursuing patents, including policies or procedures concerning when to pursue patents, invention disclosures, patent prosecution, and the citation of prior art.

REQUEST FOR PRODUCTION NO. 45.

Any and all patent licenses, cross licenses, or other similar agreements, including without limitation covenants not to sue or non-assertion agreements, in the possession, custody, or control of Apple, which (a) concern patents in the same or similar areas of technology as the technology described in each of the Apple Asserted Patents, or (b) involve companies providing products similar to Counterclaim-Defendants.

REQUEST FOR PRODUCTION NO. 46.

All documents supporting or contradicting Apple's contention it is entitled to any form of relief in this Action.

REQUEST FOR PRODUCTION NO. 47.

All documents supporting or contradicting the amount of damages Apple will claim in this Action and the calculation thereof, including all documents relating to the type of and rate of damages that Apple contends it has suffered or is owed.

REQUEST FOR PRODUCTION NO. 48.

All documents concerning each of the Mobility Asserted Patents, Related Applications thereto, or the Subject Matter of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 49.

All documents which you claim will have any bearing whatsoever on the interpretation or construction of any term of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 50.

All documents concerning any alleged Prior Art relating to the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 51.

All documents concerning the scope, validity, or enforceability of any of the claims in each of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 52.

All documents concerning any secondary consideration or other objective evidence of non-obviousness of the Mobility Asserted Patents, including commercial success, long-felt need, commercial acquiescence, expressions of skepticism, copying, teaching away, failed attempts by others, or simultaneous development and any nexus between such secondary consideration or other objective evidence of non-obviousness and the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 53.

All documents and things concerning Apple's contention as to what constituted the level of skill of a person of ordinary skill in the art to which the Subject Matter of each of the Mobility Asserted Patents pertains.

REQUEST FOR PRODUCTION NO. 54.

Each document concerning or relating to any search or study that concerns or relates to patentability, unpatentability, validity, invalidity, scope, infringement, noninfringement, enforceability, or unenforceability of one or more Mobility Asserted Patents or claim thereof, or any Related Applications.

REQUEST FOR PRODUCTION NO. 55.

Each document constituting or describing any legal opinion that Apple received relating to the infringement, noninfringement, validity, invalidity, enforceability, or unenforceability of

any of the Mobility Asserted Patents, together with documents sufficient to show the person(s) who received the opinion, the person(s) who requested the opinion, the date it was received by Apple, and the date Apple requested it.

REQUEST FOR PRODUCTION NO. 56.

All documents related to whether or not Apple infringes the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 57.

Any document concerning whether Apple's infringement of any of the Mobility Asserted Patents was or was not willful, intentional, or knowing.

REQUEST FOR PRODUCTION NO. 58.

Any document concerning whether Apple did or did not knowingly contribute to the infringement of any of the Mobility Asserted Patents or did or did not induce infringement of any of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 59.

All communications or documents referring to or otherwise evidencing any communication between Apple and a third party relating to a request for indemnification against infringement or possible infringement of any U.S. or foreign patent owned by Counterclaim-Defendants in the same area of technology or concerning the same Subject Matter as any of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 60.

All communications or documents referring to or otherwise evidencing any communication between Apple and a third party relating to infringement or possible infringement of any U.S. or foreign patent owned by Counterclaim-Defendants in the same area of technology or concerning the same Subject Matter as any of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 61.

All communications or documents referring to or otherwise evidencing a statement concerning whether Apple can make, use, sell, offer for sale, or import any Apple Accused Instrumentality without infringing any of the Mobility Asserted Patents or Related Applications.

REQUEST FOR PRODUCTION NO. 62.

All documents and things concerning any notice given by Counterclaim-Defendants to Apple reflecting Counterclaim-Defendants' contention that Apple was and is infringing or possibly infringing any of the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 63.

All documents concerning any legal or administrative proceedings to which Apple was a party accused of patent infringement, other than the present matter, including without limitation pleadings, court filings, court orders, special master reports, transcripts (whether trial, hearing, or deposition), exhibits (whether trial, hearing, filing, or deposition), and descriptions of any allegedly infringing Apple product.

REQUEST FOR PRODUCTION NO. 64.

All documents and things that support, contradict, refute, or otherwise relate to Counterclaim-Defendants' allegations and contentions contained within the Complaint or Answer, Reply, and Counterclaims, including without limitation any documents supporting Mobility's allegations that Apple has infringed and is infringing the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 65.

Documents sufficient to show the identity, including model numbers and any internal identifiers, of each Apple Accused Instrumentality.

REQUEST FOR PRODUCTION NO. 66.

All documents concerning the operation and design of any Apple Accused Instrumentality.

REQUEST FOR PRODUCTION NO. 67.

All documents and things concerning the research, design, development, manufacture, testing, operation, performance, installation, marketing, use, or sale of any of Apple Accused Instrumentality, including without limitation all source code, documentation, manuals, and design notes, and all revisions thereof.

REQUEST FOR PRODUCTION NO. 68.

Documents sufficient to show all future plans or roadmaps for developing, designing, or producing any planned replacement product for any Apple Accused Instrumentality.

REQUEST FOR PRODUCTION NO. 69.

All documents and things concerning any conference, seminar, exhibition, convention, trade show, or the like, at which any Apple Accused Instrumentality is or was discussed, referred to, advertised, displayed, demonstrated, or shown, including, without limitation, advertisements, brochures, articles, pamphlets, price lists, product specifications, or other promotional, marketing, or presentation materials.

REQUEST FOR PRODUCTION NO. 70.

All documents which constitute product definition sheets, trade literature, specification sheets, technical data sheets, papers, abstracts, speeches, descriptive documents of any kind concerning any Apple Accused Instrumentality.

REQUEST FOR PRODUCTION NO. 71.

Separately for each Apple Accused Instrumentality, a copy of each instruction manual, service manual, schematic, customer instruction sheet or brochure, product specification, data sheet, product announcement, press release, text of explanatory article, speech, lecture, or product roadmap (including, without limitation, information electronically disseminated or made available).

REQUEST FOR PRODUCTION NO. 72.

All documents that are or have been included with the sale of any Apple Accused Instrumentality, including, but not limited to, instruction product manuals, data sheets, installation manuals, retail kits, diagnostic software, installation software, or specifications.

REQUEST FOR PRODUCTION NO. 73.

All business plans including, but not limited to, strategic plans, operating plans, marketing plans, financial plans, production plans, sales plans and capital or investment plans that refer or relate to any Apple Accused Instrumentality.

REQUEST FOR PRODUCTION NO. 74.

Two physical samples of each version or model of each Apple Accused Instrumentality, together with the packaging in which it has been sold or otherwise provided and all documentation and other things included therein or with it.

REQUEST FOR PRODUCTION NO. 75.

Documents sufficient to show Apple's gross and net sales of the Apple Accused Instrumentalities for the last seven years.

REQUEST FOR PRODUCTION NO. 76.

All documents that Apple contends relate to the amount of damages that Mobility will claim in this Action and the calculation thereof, including all documents relating to the type of and rate of damages that Apple contends Mobility has suffered or is owed.

REQUEST FOR PRODUCTION NO. 77.

All documents relating to or evidencing any license (whether express or implied), covenant not to sue, non-assertion agreement, or the like which Apple contends relates to the Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 78.

All communications concerning one or more of the Mobility Asserted Patents or Related Applications, including but not limited to communications between Apple and any third party.

REQUEST FOR PRODUCTION NO. 79.

All documents concerning Apple business plans or meetings concerning any of the Mobility Asserted Patents or Related Applications.

REQUEST FOR PRODUCTION NO. 80.

All documents relating to and/or reflecting communications and meetings between Apple and any of the Counterclaim-Defendants or any other similarly situated company, including, without limitation, Elan, HTC, Oracle, Toshiba, Qualcomm, Google, RIM, Microsoft, Nokia, any LG entity, Sony-Ericsson, Samsung, Kodak, Sharp, or Hitachi, regarding any Apple Asserted Patents or Mobility Asserted Patents.

REQUEST FOR PRODUCTION NO. 81.

All documents and things concerning any of the Counterclaim-Defendants.

REQUEST FOR PRODUCTION NO. 82.

Documents sufficient to show Apple's business structure, including but not limited to organizational charts and documents concerning the identity of any past or present parent, division, subsidiary, affiliate, joint venture, partner or other associated organization.

REQUEST FOR PRODUCTION NO. 83.

Documents sufficient to describe Apple's policies or practices with respect to the retention or destruction of documents, and, if such policy or practice has been different with respect to any category of documents or over different times, documents sufficient to identify each such category or time period and to describe Apple's retention policy or practice with respect to each such category or time period.

REQUEST FOR PRODUCTION NO. 84.

The curriculum vitae of any expert witness that Apple expects to testify in this Action, review any of Defendants' confidential material, or provide an expert report in this Action.

REQUEST FOR PRODUCTION NO. 85.

All documents responsive to, considered, or relied upon in a response to any Interrogatory served on Apple in this Action.

REQUEST FOR PRODUCTION NO. 86.

All press releases, securities filings, or other documents directed to current or potential investors in Apple within the last five years.

REQUEST FOR PRODUCTION NO. 87.

All reports made by Apple to its stockholders within the past five years.

REQUEST FOR PRODUCTION NO. 88.

All documents provided to any expert or consultant retained by or on behalf of Apple in connection with this Action.

Dated: December 29, 2010

Respectfully submitted,

/s/ Mark D. Baker

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Mark D. Baker

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*Attorneys for Motorola Mobility, Inc. and
Motorola, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 29, 2010, I served the following document via electronic mail on all counsel of record identified on the attached Service List.

/s/ Mark Baker
Mark Baker

SERVICE LIST
Motorola Mobility, Inc. versus Apple Inc.
Case No. 1:10cv023580-Civ-UU
United States District Court, Southern District of Florida

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