

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

Case No. 1:10cv023580-Civ-RNS-TEB

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 JILL J. HO IN SUPPORT OF APPLE INC.'S
MOTION FOR LEAVE TO FILE AMENDED ANSWER**

I, Jill J. Ho,¹ declare under penalty of perjury, that the following is true and correct:

1. I am a member of the bar of the State of California, admitted *pro hac vice* in this action and an associate at the law firm of Weil, Gotshal & Manges LLP, counsel of record for Apple Inc. (“Apple”) in the above-captioned matter. The matters referred to in this declaration are based on personal knowledge and if called as a witness I could, and would, testify competently to these matters.

2. Attached hereto as Exhibit A is a true and correct copy of Apple’s proposed Second Amended Answer.

3. Attached hereto as Exhibit B is a true and correct copy of a March 9, 2012 email from me to Cathleen Garrigan of Quinn Emanuel Urqhart & Sullivan, LLP.

4. Attached hereto as Exhibit C is a true and correct copy of a March 12, 2012 email from me to Ms. Garrigan. Attached hereto as Exhibit D is a true and correct copy of the redlined copy of Apple’s proposed amended pleading which was attached to that email.

5. Attached hereto as Exhibit E is a true and correct copy of a March 14, 2012 email from Ms. Garrigan to me.

6. Attached hereto as Exhibit F is a true and correct copy of a March 19, 2012 email from me to Ms. Garrigan.

7. Attached hereto as Exhibit G is a true and correct copy of Motorola Mobility’s Responses to Apple’s Third Set of Interrogatories to Motorola Mobility and Motorola (Nos. 16-22), served on December 19, 2011.

¹ Jill Ho is currently in the process of adopting her married name, Jill Schmidt.

8. Attached hereto as Exhibit H is a true and correct copy of Apple's subpoena to third-party Bright House Networks, LLC.
9. Attached hereto as Exhibit I is a true and correct copy of Apple's subpoena to third-party Cablevision Systems Corporation.
10. Attached hereto as Exhibit J is a true and correct copy of Apple's subpoena to third-party Charter Communications, Inc.
11. Attached hereto as Exhibit K is a true and correct copy of Apple's subpoena to third-party Comcast Corporation.
12. Attached hereto as Exhibit L is a true and correct copy of Apple's subpoena to third-party Cox Communications, Inc.
13. Attached hereto as Exhibit M is a true and correct copy of Apple's subpoena to third-party Mediacom Communications Corporation.
14. Attached hereto as Exhibit N is a true and correct copy of Apple's subpoena to third-party Suddenlink Communications.
15. Attached hereto as Exhibit O is a true and correct copy of Apple's subpoena to third-party Time Warner Cable, Inc.
16. Attached hereto as Exhibit P is a true and correct copy of Apple's subpoena to third-party Verizon Services Corporation.
17. Attached hereto as Exhibit Q is a true and correct copy of Apple's First Set of Requests for Production to Motorola Mobility and Motorola (Nos. 1-49), served on December 29, 2010.

18. Attached hereto as Exhibit R is a true and correct copy of Apple's Third Set of Interrogatories to Motorola Mobility and Motorola (Nos. 16-22), served on November 14, 2011.
19. Attached hereto as Exhibit S is a true and correct copy of Apple's Notice of Deposition of Motorola Mobility, Inc., served on June 24, 2011.
20. Attached hereto as Exhibit T is a true and correct copy of the transcript from the deposition of Evan Groat, taken on February 28, 2012.
21. Attached hereto as Exhibit U is a true and correct copy of the transcript from the deposition of Richard Rementilla, taken on March 16, 2012.
22. Attached hereto as Exhibit V is a true and correct copy of a March 14, 2012 email from Amanda Williamson of Quinn Emanuel Urqhart & Sullivan, LLP to my colleague Sutton Ansley, cc'ing a service list of which I am a member.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 23, 2012 at Redwood Shores, California

/s/ Jill J. Ho
Jill J. Ho