

**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**

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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 TO  
COMPEL FURTHER RESPONSES TO INTERROGATORIES REGARDING  
SET-TOP BOX PATENTS (NOS. 19-22)**

I, Jill J. Ho,<sup>1</sup> 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 Motorola Mobility’s Second Supplemental Responses to Apple’s Third Set of Interrogatories to Motorola Mobility and Motorola (Nos. 19-22), served on March 9, 2012.

3. Attached hereto as Exhibit B is a true and correct copy of Apple’s infringement contentions, styled as Apple’s Supplemental Objections and Responses to Motorola Mobility and Motorola’s First Set of Interrogatories (No. 6), served on May 18, 2011. The appended infringement charts were previously filed on October 28, 2011. *See* D.E. 161.

4. Attached hereto as Exhibit C is a true and correct copy of a March 12, 2012 email from my colleague Jason Lang to John Duchemin of Quinn Emanuel Urqhart & Sullivan, LLP.

5. Attached hereto as Exhibit D is a true and correct copy of a March 13, 2012 email from Mr. Duchemin to Mr. Lang.

6. Attached hereto as Exhibit E is a true and correct copy of a March 15, 2012 email from Mr. Duchemin to Mr. Lang.

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

7. Attached hereto as Exhibit F is a true and correct copy of a March 22, 2012 email from Mr. Duchemin to Mr. Lang.
8. Attached hereto as Exhibit G is a true and correct copy of the transcript from the deposition of Evan Groat, taken on February 28, 2012.
9. Attached hereto as Exhibit H is a true and correct copy of the transcript from the deposition of Richard Rementilla, taken on March 16, 2012.
10. Attached hereto as Exhibit I is a true and correct copy of Apple's Notice of Deposition of Motorola Mobility, Inc., served on June 24, 2011.
11. Attached hereto as Exhibit J is a true and correct copy of Apple's Third Notice of Deposition of Motorola Mobility, Inc., served on February 1, 2012.
12. Attached hereto as Exhibit K is a true and correct copy of Apple's Fourth Notice of Deposition of Motorola Mobility, Inc., served on February 8, 2012.
13. Attached hereto as Exhibit L is a true and correct copy of a November 14, 2011 letter from David Perlson of Quinn Emanuel Urqhart & Sullivan, LLP to me.
14. Attached hereto as Exhibit M is a true and correct copy of a document produced by Motorola, bearing the Bates number MOTO-APPLE-0007423455.xls.

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 26, 2012 at Redwood Shores, California

/s/ Jill J. Ho  
Jill J. Ho