EXHIBIT K

**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.

APPLE INC.,

        Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

        Counterclaim Defendants.

JURY TRIAL DEMANDED

**APPLE'S FOURTH NOTICE OF DEPOSITION OF
<u>MOTOROLA MOBILITY, INC.</u>**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal

Rules of Civil Procedure, Apple Inc. ("Apple") will take the deposition of Motorola

Mobility, Inc. ("Mobility") on March 13, 2012 at 9:00 a.m. at the offices of Weil, Gotshal

& Manges LLP, 201 Redwood Shores Parkway, Redwood Shores, CA 94065, or at such

other time and place as the parties mutually agree. The deposition will continue from day to day until completed, Saturdays, Sundays, and holidays excepted.

The deposition will be taken before a court reporter or other person authorized by law to administer oaths, and it will be recorded by stenographic means and/or videotape. The deposition will be taken for the purpose of discovery, for use in summary judgment briefing or at trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure. The scope of this deposition will likely include questions relating to information that has been designated "Confidential Business Information" as that term is defined in the Protective Order for this action.

Pursuant to Rule 30(b)(6), Defendants shall designate a witness or witnesses to appear and testify at the taking of a deposition on each of the topics set forth below. Mobility shall identify the person(s) who will testify on its behalf pursuant to this notice and the matter(s) about which each person will testify no less than five calendar days prior to the date of their deposition. To the extent that Mobility intends to rely on any documents or information not yet produced in this Investigation, those documents or that information shall be produced no less than five calendar days prior to the date for the expected testimony.

DEFINITIONS

A.   **"You," "Your," "Mobility," and "Motorola Mobility"** is defined to mean and refer to Defendant Motorola Mobility, Inc. and all of its corporate locations, and all predecessors, subsidiaries, parents, and affiliates, including without limitation Motorola SpinCo Holdings Corp., and all past or present directors, officers, agents, representatives,

employees, consultants, attorneys, entities acting in joint-venture or partnership relationships with the aforementioned entities, and others acting on their behalf.

B.   **"Motorola Solutions"** is defined to mean and refer to Defendant Motorola Solutions, Inc. and all of its corporate locations, and all predecessors, subsidiaries, parents, and affiliates, including without limitation Motorola, Inc., the Mobile Devices segment of Motorola, Inc., and all past or present directors, officers, agents, representatives, employees, consultants, attorneys, entities acting in joint-venture or partnership relationships with the aforementioned entities, and others acting on their behalf.

C.   "**Apple**" shall mean Plaintiff Apple Inc. and its predecessor, Apple Computer Inc., and including without limitation all of its corporate locations, and all predecessors, subsidiaries, parents, and affiliates, and all past or present directors, officers, agents, representatives, employees, consultants, attorneys, entities acting in joint-venture or partnership relationships with Apple, and others acting on behalf of Apple.

D.   "**Action**" shall mean the above-captioned case pending before the United States District Court for the Southern District of Florida, entitled *Motorola Mobility, Inc. v. Apple Inc.* and *Apple Inc. v. Motorola Mobility, Inc. and Motorola Inc.*, Case No. 1:10cv023580-Civ-UU.

E.   "**Apple Patent(s)-in-Suit**" shall mean, individually and collectively, U.S. Patent Nos. 5,583,560, 5,594,509, 5,621,456, 6,282,646, 7,380,116, and 7,657,849.

F.   "**Apple Asserted Claim(s)"** shall mean, individually and collectively, the claims of the Apple Patents-in-Suit identified in Apple's Supplemental Response to Interrogatory No. 6, served May 18, 2011.

G.   "**Motorola Accused Set-Top Box(es)**" shall mean all set-top boxes, including but not limited to DVR boxes, that provide or operate in conjunction with an interactive user interface for managing or selecting programs or services (*e.g.*, TV programs or DVR functions), and associated hardware, including remote control devices, and software, including user interfaces and other application software designed for use on, and loaded onto, such devices that are designed, made, used, developed, researched, tested, sold, offered for sale, manufactured, or imported by or at the direction of You, including but not limited to: DCT700, DCT2500, DCT3400, DCT3412, DCT3080, DCT6200, DCT6208, DCT6400, DCT6412, DCX700, DCX3200, DCX3200 P2, DCX3400, DCH70, DCH100, DCH200, DCH3200, DCH3416, DCH6200, DCH6416, DTA100, QIP2500, QIP2708, QIP6200, QIP6416, QIP7100, and QIP7216.

H.   "**Arbitration**" shall mean Association Action in San Francisco, California between StarSight Telecast, Inc., and General Instrument, Case No. 74 181 00445 97 ("Arbitration").

I.   "**Gemstar Litigation**" shall mean Gemstar Development Corp. and Index Systems Inc. v. General Instrument Corp., 1:99-CV-1276-WBH (N.D. Ga.) and General Instrument Corporation v. Starsight Telecast, Inc., C-002790 WHA (N.D. Cal.).

TOPICS

88. The procurement, use, testing, and maintenance of any interactive programming guide (IPG) or electronic programming guide software (EPG), whether in executable or machine-readable form, that was at any time in Your possession or control since October 6, 2004.

89. Assistance, technical support, software development kits, hardware, manuals, or other information provided by You to Guideworks, LLC, Macrovision Solutions Corporation, Rovi Corp., Microsoft Corp., Gemstar-TV Guide International, Inc., and/or Aptiv Digital, Inc. since October 6, 2004 that relates to the Accused Motorola Set-Top Boxes or to the design, development, support, or testing of interactive programming guides (IPGs) or electronic programming guides (EPGs).

90. Testing by You or on Your behalf of any Motorola Accused Set-Top Box in conjunction with interactive programming guide (IPG) software or electronic programming guide (EPG) software that is made or provided by any of Guideworks, LLC, Macrovision Solutions Corporation, Rovi Corp., Microsoft Corp., Gemstar-TV Guide International, Inc., and Aptiv Digital, Inc.

91. Assistance, technical support, software kits, hardware, manuals, or other information provided by You since October 6, 2004 to any entity that makes, provides, designs, or develops any hardware or software that controls or is capable of controlling any Accused Motorola Set-Top Box.

Dated: February 8, 2012   WEIL, GOTSHAL & MANGES LLP

                                                By: _/s/ J. Jason Lang_____

                                                       J. Jason Lang
                                                       Attorneys for Apple Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Februrary 8, 2012, I served the foregoing

document via electronic mail on all counsel of record identified on the attached Service

List.

 /s/ J. Jason Lang
J. Jason Lang

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