

**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 PRODUCTION OF DOCUMENTS AND TESTIMONY REGARDING  
SET-TOP BOX COMPONENTS**

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 a March 15, 2012 email from John Duchemin of Quinn Emanuel Urqhart & Sullivan, LLP to my colleague Jason Lang, cc’ing a service list of which I am a member.

3. Attached hereto as Exhibit B 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.

4. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 5,594,509, asserted by Apple in this action.

5. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent No. 5,621,456, asserted by Apple in this action.

6. Attached hereto as Exhibit E is a true and correct copy of the transcript from the deposition of Evan Groat, taken on February 28, 2012.

7. Attached hereto as Exhibit F is a true and correct copy of Motorola Mobility’s Responses to Apple’s First Set of Requests for Production to Motorola Mobility and Motorola (Nos. 1-49), served on January 31, 2011.

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

8. Attached hereto as Exhibit G is a true and correct copy of Apple's Proposed Claim Constructions, served on July 7, 2011.
9. Attached hereto as Exhibit H is a true and correct copy of Apple's Proposed Claim Constructions, served on July 7, 2011.
10. Attached hereto as Exhibit I is a true and correct copy of a March 7, 2012 email from Mr. Duchemin to my colleague Arjun Mehra, cc'ing a service list of which I am a member.
11. Attached hereto as Exhibit J is a true and correct copy of a March 9, 2012 email from Mr. Mehra to Mr. Duchemin, cc'ing a service list of which I am a member.
12. Attached hereto as Exhibit K is a true and correct copy of a March 22, 2012 email from Mr. Duchemin to Mr. Lang, cc'ing a service list of which I am a member.
13. Attached hereto as Exhibit L is a true and correct copy of a March 9, 2012 email from Mr. Duchemin 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 26, 2012 at Redwood Shores, California

/s/ Jill J. Ho  
Jill J. Ho