

EXHIBIT 16

John Duchemin

From: John Duchemin
Sent: Thursday, February 23, 2012 7:47 PM
To: 'Ansley, Sutton'; 'AppleCov@cov.com'; 'Apple Moto Weil'
Cc: Moto-Apple-SDFL
Subject: RE: Motorola-Apple (Florida): Apple's Production Requests

Sutton,

Certain schematics are included in the production volume MOTO_AP224 at the following Bates ranges:

BegDoc#	EndDoc#
MOTO-APPLE-0007471649	MOTO-APPLE-0007471668
MOTO-APPLE-0007471669	MOTO-APPLE-0007471696
MOTO-APPLE-0007471697	MOTO-APPLE-0007471713
MOTO-APPLE-0007471714	MOTO-APPLE-0007471730
MOTO-APPLE-0007471731	MOTO-APPLE-0007471745
MOTO-APPLE-0007471746	MOTO-APPLE-0007471760
MOTO-APPLE-0007471761	MOTO-APPLE-0007471782
MOTO-APPLE-0007471783	MOTO-APPLE-0007471804

I note that several of the products on the list below are not listed as accused products in Apple's infringement contentions. Schematics for those products have not been produced.

Best,
John

From: Ansley, Sutton [<mailto:sutton.ansley@weil.com>]
Sent: Tuesday, February 21, 2012 12:37 PM
To: John Duchemin; 'AppleCov@cov.com'; Apple Moto Weil
Cc: Moto-Apple-SDFL
Subject: Motorola-Apple (Florida): Apple's Production Requests

John,

We have reviewed Motorola's production to date and have located a number of schematics for only some of Motorola's accused set-top box products. Our extensive review shows deficiencies in Motorola's production. Specifically, Motorola has failed to produce schematics for the following accused set-top boxes:

- DCT3400
- DCT3412
- DCT3416
- DCT3080
- DCT6200
- DCT6208
- DCT6400

- DCT6412
- DCT6416

- DCX3400

- QIP2708
- QIP6416
- QIP7100
- QIP7216

- DRC800

Schematics for the set-top boxes are responsive to at least Apple's Request for Production Nos. 2, 5 and 6. Please indicate by COB Wednesday, February 22, 2012 whether Motorola will cure this deficiency and produce complete schematics for the set-top box models listed, above, no later than three business days before Motorola's Rule 30(b)(6) depositions on set-top box topics (*i.e.*, COB Thursday, February 23, 2012). If these documents are not produced pursuant to our agreement, we will be forced to hold open these Rule 30(b)(6) depositions. If Motorola believes that it has already produced complete schematics for these set-top box products, please indicate where in its production by bates number the schematics for the above-listed products can be found by COB Thursday February 23, 2012.

We will not document again the numerous times that Apple has been requesting that Motorola cure these deficiencies relating to core documents such as these schematics. But, we do note that Mr. Groat's deposition is set for one week from today, and he is designated on topics that directly relate to these schematics.

We look forward to your response. Please contact us with any questions.

Best,
Sutton



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