

UNITED STATES DISTRICT COURT
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 JOHN DUCHEMIN IN SUPPORT OF MOTOROLA'S SURREPLY
REGARDING APPLE'S MOTION TO COMPEL
FURTHER SUPPLEMENTAL RESPONSES TO INTERROGATORY NOS. 19-22**

I, John Duchemin, declare:

I am a member of the bar of the State of California, admitted *pro hac vice* in this action and an associate with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Motorola Mobility, Inc. and Motorola Solutions, Inc. (f/k/a Motorola, Inc.) (collectively "Motorola"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently to the matters contained in this declaration.

1. Attached as Exhibit 1 is a true and correct copy of Apple's Supplemental Objections and Responses to Motorola Mobility and Motorola's First Set of Interrogatories (No. 6). On page 4 of these contentions, Apple lists twenty-seven Accused Set-Top Boxes. None of these Accused Products is a remote control.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 9th day of April 2012 at Redwood Shores, California.

/s/ John Duchemin

John Duchemin

EXHIBIT 1
FILED UNDER SEAL