

# EXHIBIT B

## EXHIBIT B

### UNITED STATES PATENT NO. 5,754,119

#### PRELIMINARY INFRINGEMENT CONTENTIONS<sup>1</sup>

**Accused Apple Products:** Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, Apple iPhone 5<sup>2</sup>, Apple iPad, Apple iPad + 3G, Apple iPad 2, Apple iPad 2 + 3G, 3rd Generation Apple iPad, 3rd Generation Apple iPad + 4G, 4<sup>th</sup> Generation Apple iPad<sup>3</sup>, 4<sup>th</sup> Generation Apple iPad [with cellular], Apple iPad mini<sup>4</sup>, Apple iPad mini [with cellular], 3<sup>rd</sup> Generation Apple iPod Touch, 4<sup>th</sup> Generation Apple iPod Touch, 5<sup>th</sup> Generation Apple iPod Touch<sup>5</sup>, MobileMe, and iCloud.

Apple directly infringes the '119 patent, either literally or through the doctrine of equivalents, pursuant to 35 U.S.C. § 271(a).

In addition to Apple's direct infringement of the '119 patent through its development, testing, use, distribution and sale of its products and services, Apple also indirectly infringes the '119 patent pursuant to 35 U.S.C. § 271(b) and (c). End-users and others in the distribution channel of the Accused Apple Products directly infringe this claim by using, selling, offering for sale, and/or importing these devices into the United States. Apple contributes to and induces infringement through its promotion and provision of marketing,

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<sup>1</sup> Motorola Mobility's investigation is ongoing and discovery is not yet complete. Apple has, thus far, not produced all of its documents and source code relevant to the accused methods and products. Motorola reserves the right to supplement or amend these contentions based on subsequent discovery or disclosures made pursuant to FRCP 26. Motorola further reserves the right to amend and supplement its contentions with respect to any products released by Apple subsequent to the service of these initial infringement contentions, in accordance with the schedule set forth in the Court's Order of October 25, 2012. Further, to the extent Apple releases any new products with the same functionality accused of infringement in the Accused Apple Products in these contentions, Motorola reserves the right to seek appropriate relief from the court in accordance with its order of October 25, 2012 and in accordance with the Federal Rules of Civil Procedure.

<sup>2</sup> The term "Apple iPhone 5" means Apple's new iPhone announced by Apple on September 12, 2012. *See* <http://www.apple.com/pr/library/2012/09/12Apple-Introduces-iPhone-5.html>.

<sup>3</sup> The terms "4<sup>th</sup> Generation Apple iPad" and "4<sup>th</sup> Generation Apple iPad [with cellular]" mean Apple's new iPad devices announced by Apple on October 23, 2012. *See* <http://www.apple.com/pr/library/2012/10/23Apple-Introduces-iPad-mini.html>.

<sup>4</sup> The terms "Apple iPad mini" and "Apple iPad mini [with cellular]" mean Apple's new iPad mini devices announced by Apple on October 23, 2012. *See* <http://www.apple.com/pr/library/2012/10/23Apple-Introduces-iPad-mini.html>.

<sup>5</sup> The term "5<sup>th</sup> Generation Apple iPod Touch" means Apple's new iPod Touch announced by Apple on September 12, 2012. *See* <http://www.apple.com/pr/library/2012/09/12Apple-Introduces-New-iPod-touch-iPod-nano.html>.

## EXHIBIT B



sale and/or technical support of the Accused Apple Products and associated services in the United States, and through the design, marketing, manufacture, sale, and/or technical support of the Accused Apple Products. Apple supplies Accused Apple Products and actively encourages the use, sale, offer for sale, and importation of the same in the United States through the promotion and provision of marketing literature, promotion, and user guides, which induces and results in direct infringement. Apple has known or should have known that these actions would cause direct infringement of the '119 patent and did so with specific intent to encourage direct infringement, at least as of 2007, when Apple and Motorola participated in talks regarding the licensing of Motorola's patent portfolio. On information and belief, in connection with those negotiations, Apple has reviewed said portfolio, including Motorola's '119 Patent. Moreover, Apple has known of the '119 patent since at least October 6, 2012, when Motorola filed its Complaint, attaching the '119 patent as an exhibit. Despite knowing of the '119 patent, Apple continues to make, use, offer to sell, and sell its products and has continued to circulate marketing literature and user guides encouraging users of the Accused Apple Products to infringe. Additionally, the identified features of the Accused Apple Products are material parts of the inventions of the asserted claims and have no substantial non-infringing uses.

<b>'119 Patent Claim</b>	<b>Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
1. A method of synchronizing message information among a plurality of transceivers comprising the steps of:	Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim. Apple's MobileMe / iCloud service with an Apple iOS Device practices a method of synchronizing message information among a plurality of transceivers:

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<sup>6</sup> This chart provides Motorola's infringement analysis for the MobileMe and/or iCloud service communicating with the Accused Apple Products. In this claim chart, "Apple iOS Device" refers to the Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, Apple iPhone 5, Apple iPad, Apple iPad + 3G, Apple iPad 2, Apple iPad 2 with 3G, 3rd Generation Apple iPad, 3rd Generation Apple iPad + 4G, 4<sup>th</sup> Generation Apple iPad<sup>6</sup>, 4<sup>th</sup> Generation Apple iPad [with cellular], Apple iPad mini<sup>6</sup>, Apple iPad mini [with cellular], 3<sup>rd</sup> Generation Apple iPod Touch, 4<sup>th</sup> Generation Apple iPod Touch, and 5<sup>th</sup> Generation Apple iPod Touch. Upon information and belief, the analysis set forth in this chart for "Apple iOS Device" applies equally to each such device. Because, upon information and belief, the analysis set forth in this chart applies equally to both MobileMe and iCloud, they are referred to together herein as "MobileMe / iCloud."

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<div data-bbox="625 305 1157 435"><h3>Mail, Contacts, and Calendar</h3></div> <div data-bbox="632 480 1199 721"><p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p></div> <div data-bbox="632 792 1207 1019"><p>Push email, push contacts, push calendar.</p><p><a href="#">Watch the QuickTour ▶</a></p></div> <div data-bbox="1241 310 1871 984"></div> <p>MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p> <p><i>See also</i> iPhone User Guide for iPhone OS 3.1 Software, at MOTO-APPLE-0006037953_126971:</p>


## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p data-bbox="867 266 1102 293"><b>Setting Up Accounts</b></p> <p data-bbox="867 302 1648 444">MobileMe and Microsoft Exchange provide not only email, but contact and calendar information that can be synced to iPhone automatically, over the air. MobileMe can also sync your bookmarks on iPhone with Safari on a Mac, or with Safari or Microsoft Internet Explorer on a PC. You set up MobileMe, Exchange, and other email accounts directly on iPhone.</p> <p data-bbox="590 496 1850 602"><i>See also</i> MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p> <p data-bbox="606 659 1045 691"><b>How MobileMe syncing works</b></p> <p data-bbox="606 735 1902 898">MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact's phone number on your iPhone, and it differs from the contact's number stored on your iDisk.</p> <p data-bbox="627 976 1879 1130">If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p data-bbox="590 1211 1885 1317"><i>See also</i> MobileMe on you iPhone or iPod touch, (<a href="http://www.apple.com/mobileme/features/iphone.html">http://www.apple.com/mobileme/features/iphone.html</a>), accessed on May 16, 2011, MOTO-APPLE-0006037953_126654:</p>


## EXHIBIT B

'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
	<p><b>Always up to date.</b></p> <p>As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You're notified as soon as it arrives, so you don't have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date.</p> <p><i>See also</i> What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:</p>

## EXHIBIT B




'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p data-bbox="604 264 798 289">November 5, 2008</p> <h3 data-bbox="831 264 1392 297">What Is IMAP and Why Do We Use It?</h3> <p data-bbox="831 313 1486 589">There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p data-bbox="831 630 1770 914">The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p data-bbox="831 946 1770 1068">With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p data-bbox="590 1117 1892 1182"><i>See also, iCloud - Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</i></p>

## EXHIBIT B


'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<div data-bbox="667 289 926 407"> Mail</div> <div data-bbox="667 448 1050 480"><b>Mail that delivers. Free.</b></div> <div data-bbox="667 496 1776 602"><p>When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p></div> <div data-bbox="590 667 1860 773"><p>See also, Apple devices with iOS 6 – iPhone User Guide For iOS 6 Software, p. 15 (<a href="http://manuals.info.apple.com/en/iphone_user_guide.pdf">http://manuals.info.apple.com/en/iphone_user_guide.pdf</a>), accessed on 11/06/2012, MOTO-SDFL-0000016147:</p></div> <div data-bbox="617 816 730 854"><b>iCloud</b></div> <div data-bbox="617 865 1692 979"><p>iCloud stores your content, including music, photos, contacts, calendars, and supported documents. Content stored in iCloud is pushed wirelessly to your other iOS devices and computers set up with the same iCloud account.</p></div> <div data-bbox="617 1019 1812 1092"><ul style="list-style-type: none"><li>• <i>Mail, Contacts, Calendars</i>—Keep your mail contacts, calendars, notes, and reminders up to date across all your devices.</li></ul></div> <div data-bbox="590 1133 1854 1422"><p>In addition, through its design of the Accused Apple Products, Apple also induced users of the Accused Apple Products to infringe the '119 patent. Apple and Motorola have been in talks since 2007 regarding the licensing of Motorola's patent portfolio, and, on information and belief, in accordance with those negotiations, Apple has reviewed said portfolio, including Motorola's '119 Patent. Thus, at least as early as 2007, Apple knew or should have known its actions would induce actual infringement and possessed specific intent to encourage its customers' direct infringement through the design of the Accused Apple products. In addition, Apple instructs the users of the Accused Apple Products to use them in an infringing manner, including but not limited to by</p></div>



## EXHIBIT B

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	<p>describing infringing uses in its advertisements, promotional materials, labels, and user manuals. <i>See e.g.</i> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p> <div data-bbox="625 435 1873 1149"><h3>Mail, Contacts, and Calendar</h3><p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p></div> <p><i>See also, e.g.</i> MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p>

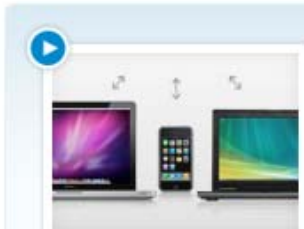

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p><b>How MobileMe syncing works</b></p> <p>MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact's phone number on your iPhone, and it differs from the contact's number stored on your iDisk.</p> <p>If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p><i>See also</i>, iCloud - Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p> <div data-bbox="667 928 787 1047"></div> <p><b>Mail</b></p> <p><b>Mail that delivers. Free.</b></p> <p>When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p> <p><i>See also</i>, Apple devices with iOS 6 – iPhone User Guide For iOS 6 Software, p. 15 (<a href="http://manuals.info.apple.com/en/iphone_user_guide.pdf">http://manuals.info.apple.com/en/iphone_user_guide.pdf</a>), accessed on 11/06/2012, MOTO-SDFL-</p>


**EXHIBIT B**

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>0000016147:</p> <p><b>iCloud</b></p> <p>iCloud stores your content, including music, photos, contacts, calendars, and supported documents. Content stored in iCloud is pushed wirelessly to your other iOS devices and computers set up with the same iCloud account.</p> <ul style="list-style-type: none"><li>• <i>Mail, Contacts, Calendars</i>—Keep your mail contacts, calendars, notes, and reminders up to date across all your devices.</li></ul> <p>Moreover, Apple also contributes to the infringement of the '119 patent by users of the device. As indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Accused Apple Products would contribute to direct infringement of the '119 Patent. Apple knew that the Accused Apple Products contain a specific synchronization software component, a component with no substantial non-infringing use, that could be combined with Apple's MobileMe / iCloud service, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Accused Apple Products users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Accused Apple Products, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. <i>See e.g.</i> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187.</p>

## EXHIBIT B

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	<div data-bbox="627 305 1157 431"><h3>Mail, Contacts, and Calendar</h3></div> <div data-bbox="632 480 1199 721"><p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p></div> <div data-bbox="632 792 1207 1019"><div data-bbox="961 857 1171 993"><p>Push email, push contacts, push calendar.</p><p><a href="#">Watch the QuickTour ▶</a></p></div></div> <div data-bbox="1241 310 1871 984"></div> <p data-bbox="590 1062 1850 1166"><i>See also, e.g. MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</i></p>

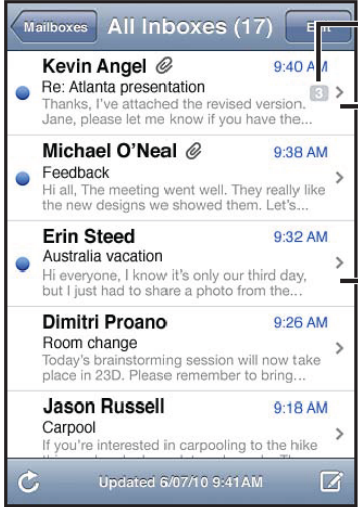
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'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p data-bbox="604 280 1045 313"><b>How MobileMe syncing works</b></p> <p data-bbox="604 354 1902 521">MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact's phone number on your iPhone, and it differs from the contact's number stored on your iDisk.</p> <p data-bbox="604 594 1902 751">If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p data-bbox="590 833 1892 898"><i>See also</i>, iCloud - Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p> <div data-bbox="667 964 926 1081"> <b>Mail</b></div> <p data-bbox="667 1125 1050 1157"><b>Mail that delivers. Free.</b></p> <p data-bbox="667 1174 1776 1279">When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p> <p data-bbox="590 1344 1864 1409"><i>See also</i>, Apple devices with iOS 6 – iPhone User Guide For iOS 6 Software, p. 15 (<a href="http://manuals.info.apple.com/en/iphone_user_guide.pdf">http://manuals.info.apple.com/en/iphone_user_guide.pdf</a>), accessed on 11/06/2012, MOTO-SDFL-</p>

**EXHIBIT B**

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>0000016147:</p> <p><b>iCloud</b></p> <p>iCloud stores your content, including music, photos, contacts, calendars, and supported documents. Content stored in iCloud is pushed wirelessly to your other iOS devices and computers set up with the same iCloud account.</p> <ul style="list-style-type: none"><li>• <i>Mail, Contacts, Calendars</i>—Keep your mail contacts, calendars, notes, and reminders up to date across all your devices.</li></ul>
transmitting by a wireless messaging infrastructure a first message having a first status;	<p>Upon information and belief, MobileMe/iCloud transmits by a wireless messaging structure a first message having a first status. For example, this first message could be an email (a first message) that has a status of the email being "Unread" (a first status). This first message could also be a calendar event, or contact information.</p> <p>iPhone User Guide for iOS 4.2 and 4.3 Software, "Checking and Reading Email," MOTO-APPLE-0006037953_126750: "When you open a mailbox, Mail retrieves and displays the most recent messages, and shows the number of unread messages at the top of the screen. Unread messages have a blue dot next to them . . . . If you organize messages by thread, related messages appear as a single entry in the mailbox. Message threads have a number next to the right arrow, showing the number of messages in the thread. A blue dot indicates that one or more messages in the thread are unread."</p>

## EXHIBIT B

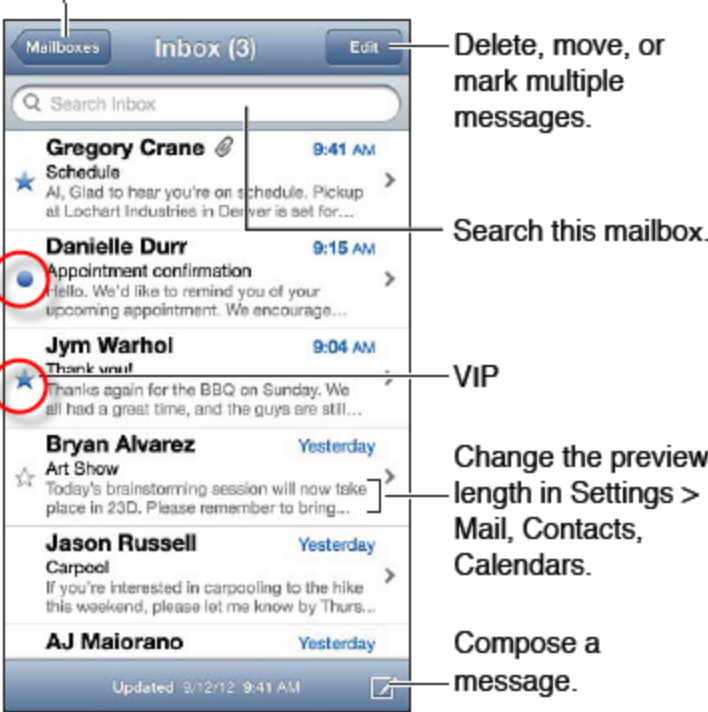
'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<div data-bbox="627 289 982 792"></div> <p data-bbox="1024 297 1228 418">Number of messages in thread</p> <p data-bbox="1024 492 1312 524">Unread messages</p> <p data-bbox="590 849 1833 919">See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188:</p>

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
	<p><b>Push email</b></p> <p>When you join MobileMe, you get a me.com email account that's always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you're notified the instant they arrive. MobileMe constantly checks for new messages, so you don't have to. And when you use MobileMe, you'll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That's because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p>The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more ▶</a></p> <p><i>See also, iCloud email service—<a href="http://support.apple.com/kb/TS4083">http://support.apple.com/kb/TS4083</a>, accessed on 11/06/2012, MOTO-SDFL-0000018786:</i></p> <p>If your iCloud email account is configured to use Push (in the Fetch New Data settings on your device), your iPhone, iPad, or iPod touch will update automatically whenever you receive a new message in your @me.com or @mac.com Inbox.</p> <p><i>See also, Apple devices with iOS 6 – iPhone User Guide For iOS 6 Software, pp. 51, 65 (<a href="http://manuals.info.apple.com/en/iphone_user_guide.pdf">http://manuals.info.apple.com/en/iphone_user_guide.pdf</a>), accessed on 11/06/2012, MOTO-SDFL-</i></p>




## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>0000016183, 16197 (circles added):</p>  <p>Conversations are saved in the Messages list. A blue dot indicates unread messages. Tap a conversation to view or continue it.</p>
in one transceiver of the plurality of transceivers, changing the first status of the first message to a second status responsive to an input	Upon information and belief, in an Apple iOS Device, (one transceiver of the plurality of transceivers), the first status of the first message is changed to a second status responsive to an input to the one transceiver, and a second message is transmitted indicative of the second status. The first message could be an email, calendar appointment, or a contact.

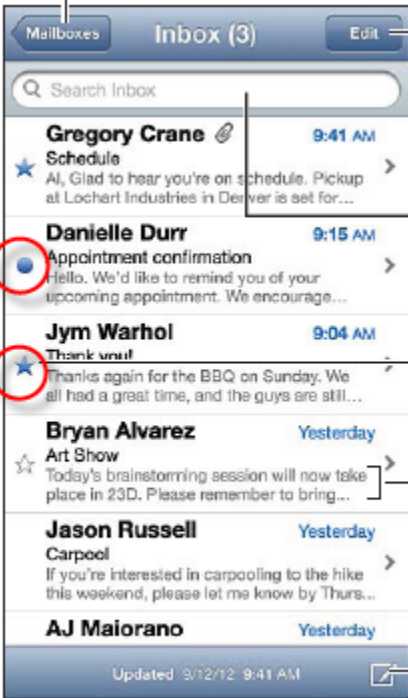
## EXHIBIT B

'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
to the one transceiver, and transmitting a second message indicative of the second status;	<p>For example, in an Apple iOS Device, if the first message was an email, the status of the email changes from “Unread” (the first status) to “Read” in response to the user selecting the email in the Mail of iOS (an input to the one transceiver), and a second message is transmitted indicative of the email's status of “Unread” (the second status). Additionally, in an Apple iOS Device (one transceiver of the plurality of transceivers), the status of the email changes from “Unread” (the first status) to “Deleted” in response to the user deleting the email in the Mail of iOS (an input to the one transceiver), and a second message is transmitted indicative of the email's status of “Deleted” (the second status):</p> <p style="text-align: center;"><b>Push email</b></p> <p style="text-align: center;">When you join MobileMe, you get a me.com email account that's always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you're notified the instant they arrive. MobileMe constantly checks for new messages, so you don't have to. And when you use MobileMe, you'll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That's because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p style="text-align: center;">The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more ▶</a></p> <p>See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.</p>

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>See also What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:</p> <p>November 5, 2008 <b>What Is IMAP and Why Do We Use It?</b></p> <p>There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p>The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p>With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p>See also, Apple devices with iOS 6 – iPhone User Guide For iOS 6 Software, pp. 51, 65 (<a href="http://manuals.info.apple.com/en/iphone_user_guide.pdf">http://manuals.info.apple.com/en/iphone_user_guide.pdf</a>), accessed on 11/06/2012, MOTO-SDFL-0000016183, 16197, (circles added):</p>

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	 <p>Conversations are saved in the Messages list. A blue dot indicates unread messages. Tap a conversation to view or continue it.</p> <p>See also, iCloud email service—<a href="http://support.apple.com/kb/TS4083">http://support.apple.com/kb/TS4083</a>, accessed on 11/06/2012, MOTO-SDFL-0000018786:</p> <p>If your iCloud email account is configured to use Push (in the Fetch New Data settings on your device), your iPhone, iPad, or iPod touch will update automatically whenever you receive a new message in your @me.com or @mac.com Inbox.</p> <p>See also, iCloud mail overview—<a href="http://support.apple.com/kb/PH2618">http://support.apple.com/kb/PH2618</a>, accessed on 11/06/2012,</p>

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>MOTO-SDFL-0000018647:</p> <p>With iCloud Mail, new messages are pushed to your iPhone, iPad, and iPod touch. You're immediately notified when new mail arrives so you don't miss important messages. And iCloud keeps your inbox and mail folders up to date across your iOS devices and computers.</p>
in the wireless messaging infrastructure, receiving the second message, and responsive to receiving the second message, transmitting a third message indicative of the second status; and	<p>Upon information and belief, MobileMe's / iCloud's wireless messaging infrastructure receives the second message, and responsive to the second message, transmits a third message indicative of the second status.</p> <p>For example, where the first message was an email, MobileMe's IMAP server (the wireless messaging infrastructure) receives the second message. In response to the receipt of the second message, the IMAP server transmits a third message indicative of the email's status of "Unread" or "Deleted" (the second status). Indeed, but for the receipt of the second message, the third message would not have been sent. <i>See, e.g.</i>, Apple's Markman slides for '119 patent at 45-49; Markman Transcript 443:20-445:9.</p>



## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p><b>Push email</b></p> <p>When you join MobileMe, you get a me.com email account that's always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you're notified the instant they arrive. MobileMe constantly checks for new messages, so you don't have to. And when you use MobileMe, you'll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That's because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p>The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more ▶</a></p> <p>See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.</p> <p>See also MobileMe on your iPhone or iPod touch, (<a href="http://www.apple.com/mobileme/features/iphone.html">http://www.apple.com/mobileme/features/iphone.html</a>), accessed on May 16, 2011, MOTO-APPLE-0006037953_126654:</p>

## EXHIBIT B


'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
	<p><b>Always up to date.</b></p> <p>As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You're notified as soon as it arrives, so you don't have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date.</p> <p><i>See also</i> iPhone User Guide for iPhone OS 3.1 Software, at MOTO-APPLE-0006037953_126971:</p> <p><b>Setting Up Accounts</b></p> <p>MobileMe and Microsoft Exchange provide not only email, but contact and calendar information that can be synced to iPhone automatically, over the air. MobileMe can also sync your bookmarks on iPhone with Safari on a Mac, or with Safari or Microsoft Internet Explorer on a PC. You set up MobileMe, Exchange, and other email accounts directly on iPhone.</p> <p><i>See also</i> MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:</p>

## EXHIBIT B


'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<div data-bbox="625 305 1159 435"><h3>Mail, Contacts, and Calendar</h3></div> <div data-bbox="632 480 1201 721"><p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p></div> <div data-bbox="632 792 1207 1019"></div> <div data-bbox="1241 305 1871 984"></div> <div data-bbox="583 1057 1908 1166"><p>See also What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed on May 5, 2011, MOTO-APPLE-0006037953_126657:</p></div>



## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p data-bbox="604 264 798 289">November 5, 2008</p> <h3 data-bbox="831 264 1392 297">What Is IMAP and Why Do We Use It?</h3> <p data-bbox="831 313 1486 589">There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p data-bbox="831 630 1770 906">The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p data-bbox="831 946 1770 1060">With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p data-bbox="590 1117 1892 1174"><i>See also, iCloud - Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</i></p>

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	 <p><b>Mail</b></p> <p><b>Mail that delivers. Free.</b></p> <p>When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p> <p><i>See also, iCloud email service—<a href="http://support.apple.com/kb/TS4083">http://support.apple.com/kb/TS4083</a>, accessed on 11/06/2012, MOTO-SDFL-0000018786:</i></p> <p>If your iCloud email account is configured to use Push (in the Fetch New Data settings on your device), your iPhone, iPad, or iPod touch will update automatically whenever you receive a new message in your @me.com or @mac.com Inbox.</p> <p><i>See also, iCloud mail overview—<a href="http://support.apple.com/kb/PH2618">http://support.apple.com/kb/PH2618</a>, accessed on 11/06/2012, MOTO-SDFL-0000018647:</i></p> <p>With iCloud Mail, new messages are pushed to your iPhone, iPad, and iPod touch. You're immediately notified when new mail arrives so you don't miss important messages. And iCloud keeps your inbox and mail folders up to date across your iOS devices and computers.</p>
in at least one other transceiver of the plurality of transceivers, receiving the third message, and responsive to receiving the third message, changing the first status of the first message to the second status.	<p>Upon information and belief, at least one other Apple iOS Device receives the third message, and responsive to receiving the third message, changes the first status of the first message to the second status.</p> <p>For example, where the first message was an email, the first status of the email changes from "Unread" to "Read" or "Deleted" (the second status):</p>



## EXHIBIT B

'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
	<p><b>Push email</b></p> <p>When you join MobileMe, you get a me.com email account that's always up to date. New messages are pushed to your iPhone, iPad, or iPod touch automatically, and you're notified the instant they arrive. MobileMe constantly checks for new messages, so you don't have to. And when you use MobileMe, you'll notice that the inbox on your iPhone or iPad looks a lot like the inbox on your Mac at home, which also looks a lot like the inbox on your PC at work. That's because it is. Read messages are marked as read, and all your folders are exactly the way you left them, no matter what device you use. Last but not least, your MobileMe inbox is entirely ad free and includes spam and virus protection.</p> <p>The MobileMe Mail Beta offers even more great email features. <a href="#">Learn more ▶</a></p> <p><i>See MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127188.</i></p> <p><i>See also MobileMe on you iPhone or iPod touch, (<a href="http://www.apple.com/mobileme/features/iphone.html">http://www.apple.com/mobileme/features/iphone.html</a>), accessed on May 16, 2011, MOTO-APPLE-0006037953_126654:</i></p>


## EXHIBIT B

'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
	<p><b>Always up to date.</b></p> <p>As soon as your email account receives a new message, MobileMe pushes it over the air to your iPhone or iPod touch. You're notified as soon as it arrives, so you don't have to waste time checking. Because your iPhone and iPod touch send and receive updates over the air, contacts you add and changes you make to your calendar on iPhone or iPod touch are updated on the web at me.com automatically, then synced to your Mac and PC. MobileMe even syncs your Safari and Internet Explorer bookmarks. And it all happens without the need to dock or connect a cable. That means wherever you go, your email, contacts, and calendar are always up to date.</p> <p><i>See also</i> MobileMe Help: How MobileMe syncing works, (<a href="http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html">http://docs.info.apple.com/article.html?path=MobileMe/Help/en/mm5b08c671.html</a>), accessed on May 17, 2011, MOTO-APPLE-0006037953_127252-53:</p> <p><b>How MobileMe syncing works</b></p> <p>MobileMe stores your synced information in a folder (called SyncServices) on your iDisk. Every time a computer or device is synced with MobileMe, MobileMe compares the information on your computer or device with the information stored on your iDisk and makes sure that both locations have the most accurate and up-to-date information. Sometimes MobileMe asks you to resolve conflicts, such as when you update a contact's phone number on your iPhone, and it differs from the contact's number stored on your iDisk.</p>


## EXHIBIT B

'119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
	<p>If, for example, you have two computers with Mac OS X v10.6, a Windows computer, and an iPhone, and you sync every type of data you can on all of them, information you change on one Mac is updated on the other Mac. Contacts, calendars, and bookmarks are updated on your Windows computer and your iPhone, and contacts and calendars are updated at me.com. If you add a contact to your iPhone, the contact is added to all your computers and to your Contacts application at me.com. And any change you make at me.com appears on all computers and devices you sync with MobileMe.</p> <p>See also Exhibit MobileMe Features, (<a href="http://www.apple.com/mobileme/features/">http://www.apple.com/mobileme/features/</a>), accessed on May 13, 2011, MOTO-APPLE-0006037953_127187:</p> <h3>Mail, Contacts, and Calendar</h3> <p>MobileMe keeps your mail, contacts, and calendar information in the cloud and uses push technology to keep everything in sync across your iPhone, iPad, Mac, PC, and the web automatically. So no matter where you go or what device you use, all your information is up to date — no docking required.</p> <div data-bbox="634 1079 1207 1307">  <p>Push email, push contacts, push calendar.  <a href="#">Watch the QuickTour ▶</a></p> </div>  <p>See also What is IMAP and Why Do We Use It, (<a href="http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html">http://www.apple.com/mobileme/news/2008/11/what-is-imap-and-why-do-we-use-it.html</a>), accessed</p>

## EXHIBIT B

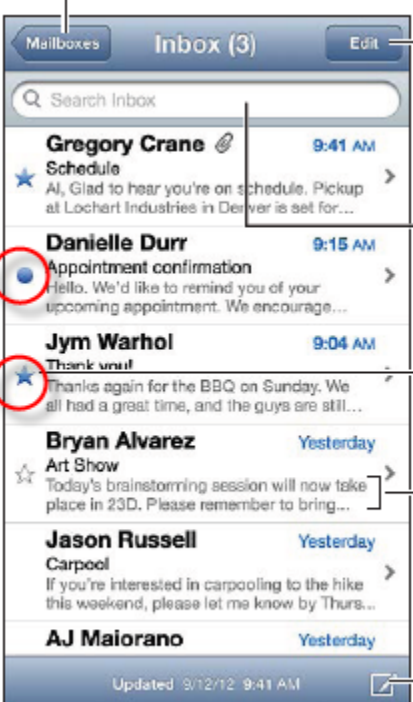
'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>on May 5, 2011, MOTO-APPLE-0006037953_126657:</p> <p>November 5, 2008 <b>What Is IMAP and Why Do We Use It?</b></p> <p>There aren't many industry acronyms it helps to know about, but IMAP is one of them. The words the letters stand for, Internet Message Access Protocol, don't exactly cause the heart to leap, but the protocol itself defines a promise that matters a lot to anyone who handles their mail from more than one location. The promise boils down to this: whenever you go to your inbox and other folders, no matter from where, things will be exactly as you last left them, no matter from where. And that's why we use it for MobileMe email accounts.</p>  <p>The protocol puts what's on the cloud (server) in charge. It lets you access your account and work with it locally from a variety of places via different applications. But it insists that the master copy be kept on the server and that all changes be recorded there, so that each new log-in produces the inbox and folder contents you expect to see. In the other standard messaging protocol, POP, the local copy is primary, and when you access your mail it is generally removed from the server after being copied down to your local inbox. If you access your messages from more than one place, life can get confusing--a message you want to read on the road might have already been downloaded to a different computer or a filing change you make at work won't be reflected back at home.</p> <p>With an IMAP account things just work the way you'd expect from the way they look, so you don't have to think about it. It's got the possibility of "mobile" built into its core. If you haven't set up your computer, iPhone, or iPod touch with your MobileMe IMAP account yet, check out these instructions.</p> <p>See also, iCloud - Calendar, Mail, and Contacts, <a href="http://www.apple.com/icloud/features/calendar-mail-contacts.html">http://www.apple.com/icloud/features/calendar-mail-contacts.html</a>, accessed on October 27, 2011:</p>

## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<div data-bbox="667 289 928 406">  <b>Mail</b> </div> <p data-bbox="667 446 1050 479"><b>Mail that delivers. Free.</b></p> <p data-bbox="667 495 1774 600">When you set up iCloud, you get a free me.com email account. iCloud automatically pushes new email messages to all your devices, so your inbox is up to date everywhere you check it. And iCloud keeps all your folders in sync, no matter which device you're using.</p> <p data-bbox="590 665 1795 730"><i>See also</i>, iCloud email service—<a href="http://support.apple.com/kb/TS4083">http://support.apple.com/kb/TS4083</a>, accessed on 11/06/2012, MOTO-SDFL-0000018786:</p> <p data-bbox="590 755 1879 852">If your iCloud email account is configured to use Push (in the Fetch New Data settings on your device), your iPhone, iPad, or iPod touch will update automatically whenever you receive a new message in your @me.com or @mac.com Inbox.</p> <p data-bbox="590 868 1816 933"><i>See also</i>, iCloud mail overview—<a href="http://support.apple.com/kb/PH2618">http://support.apple.com/kb/PH2618</a>, accessed on 11/06/2012, MOTO-SDFL-0000018647:</p> <p data-bbox="590 950 1869 1047">With iCloud Mail, new messages are pushed to your iPhone, iPad, and iPod touch. You're immediately notified when new mail arrives so you don't miss important messages. And iCloud keeps your inbox and mail folders up to date across your iOS devices and computers.</p>
<p data-bbox="191 1084 583 1299">2. The method according to claim 1 wherein the first status is an unread status and the second status is includes read, deleted, or protected status.</p>	<p data-bbox="583 1084 1906 1339">Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim, has actively induced users to perform such steps, and has contributed to such use by selling the accused products and providing directions for their use. Apple's MobileMe / iCloud service with an Apple iOS Device practice a method according to claim 1 wherein the first status is an unread status and the second status is includes read, deleted, or protected status.</p> <p data-bbox="583 1372 1906 1412">As discussed above in Claim 1, MobileMe / iCloud will transmit to an Apple iOS Device an email that</p>



## EXHIBIT B

'119 Patent Claim	Representative Apple Product: Apple MobileMe / iCloud communicating with an Apple iOS Device <sup>6</sup>
	<p>has a first status of "Unread."</p> <p>When a user of an Apple iOS Device selects or deletes a message in the Mail of iOS, the email's status changes to a second status of "Read" or "Deleted." <i>See</i> Claim 1 contentions above.</p> <p><i>See also</i>, Apple devices with iOS 6 – iPhone User Guide For iOS 6 Software, pp. 51, 65 (<a href="http://manuals.info.apple.com/en/iphone_user_guide.pdf">http://manuals.info.apple.com/en/iphone_user_guide.pdf</a>), accessed on 11/06/2012, MOTO-SDFL-0000016183, 16197 (circles added):</p>  <p>Conversations are saved in the Messages list. A blue dot indicates unread messages. Tap a conversation to view or continue it.</p>



## EXHIBIT B

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
<p>5. A method of synchronizing a status of a plurality of transceivers comprising the steps of:</p>	<p>Upon information and belief, the Accused Apple Products perform each and every step of this claim in the course of normal use. Additionally, a user of an Accused Apple Product performs each and every step of this claim in the course of such use. Furthermore, Apple has performed each and every step of this claim. Apple’s MobileMe / iCloud service with an Apple iOS Device practice a method of synchronizing message information among a plurality of transceivers. <i>See</i> Claim 1 contentions above.</p> <p>In addition, through its design of the Accused Apple Products, Apple also induced users of the Accused Apple Products to infringe the '119 patent. Apple and Motorola have been in talks since 2007 regarding the licensing of Motorola's patent portfolio, and, on information and belief, in accordance with those negotiations, Apple has reviewed said portfolio, including Motorola's '119 Patent. Thus, at least as early as 2007, Apple knew or should have known its actions would induce actual infringement and possessed specific intent to encourage its customers' direct infringement through the design of the Accused Apple products. In addition, Apple instructs the users of the Accused Apple Products to use them in an infringing manner, including but not limited to by describing infringing uses in its advertisements, promotional materials, labels, and user manuals. <i>See</i> Claim 1 contentions above.</p> <p>Moreover, Apple also contributes to the infringement of the '119 patent by users of the device. As indicated above, at least as early as 2007, Apple knew that offering to sell or selling the Accused Apple Products would contribute to direct infringement of the '119 Patent. Apple knew that the Accused Apple Products contain a specific synchronization software component, a component with no substantial non-infringing use, that could be combined with Apple's MobileMe / iCloud service, and that this combination, for which the two components were especially made, was both patented and infringing. Moreover, Accused Apple Products users have, in fact, combined these components into an infringing device. Apple further contributes to the direct infringement of the users of the Accused Apple Products, including but not limited to by describing infringing combinations in its advertisements, promotional materials, and user manuals. <i>See</i> Claim 1 contentions above.</p>
<p>in a first transceiver, changing the status of the first transceiver from a first</p>	<p>Upon information and belief, in a first transceiver connected to the MobileMe / iCloud network the status of the first transceiver changes from a first status to a second status as a result of an input from a user, and transmits a first message indicative of the second status.</p>

## EXHIBIT B

‘119 Patent Claim	Representative Apple Product: <b>Apple MobileMe / iCloud communicating with an Apple iOS Device<sup>6</sup></b>
status to a second status as a result of an input from a user, and transmitting a first message indicative of the second status;	For example, an Apple iOS Device, (first transceiver) can, as a result of input from a user, change the status of email, calendar, or contact information (first status) to reflect, <i>e.g.</i> , email deletions, new calendar appointments, and/or new contacts (second status) and transmit a first message indicative of the second status to the MobileMe / iCloud communication server. <i>See</i> Claim 1 contentions above.
in a wireless messaging infrastructure, receiving the first message, and transmitting a second message indicative of the second status; and	<p>Upon information and belief, MobileMe / iCloud's wireless messaging infrastructure, receives the first message, and transmits a second message indicative of the second status.</p> <p>To continue the above example, the MobileMe / iCloud's IMAP server (the wireless messaging infrastructure) receives the first message. In response to the receipt of the first message, the IMAP server transmits a second message indicative of the second status, <i>e.g.</i>, any email deletions, new calendar appointments, and/or new contacts (second status). Indeed, but for the receipt of the first message, the second message would not have been sent. <i>See, e.g.</i>, Apple's Markman slides for '119 patent at 45-49; Markman Transcript 443:20-445:9. <i>See</i> Claim 1 contentions above.</p>
in a second transceiver, receiving the second message, and changing a status of the second transceiver to the second status in response thereto.	<p>Upon information and belief, a second transceiver connected to the MobileMe / iCloud network receives the second message, and changes a status of the second transceiver to the second status in response thereto.</p> <p>To continue the above example, a second Apple iOS Device receives the second message transmitted by the MobileMe / iCloud IMAP server, and in response thereto, changes the status of, <i>e.g.</i>, any email, calendar, or contact information to reflect any email deletions, new calendar appointments, and/or new contacts (second status). <i>See</i> Claim 1 contentions above.</p>