

# EXHIBIT O

**Subject:** Apple / Motorola

**Date:** Tuesday, December 28, 2010 2:59:37 PM PT

**From:** Cherensky, Steven

**To:** Edward DeFranco

**CC:** Moto-Apple@quinnemanuel.com, Apple Moto WI Attorneys, Apple Moto FL Attorneys

Ed,

We think that it may make sense to consolidate (via joint motions to dismiss/transfer) all of the patents currently asserted in district courts (W.D. Wis., S.D. Fla. and D. Del.) between Motorola and Apple in a single venue for adjudication. As there is already a schedule in place in the Wisconsin 10-cv-662 case, and a pending motion to transfer the D. Del. patents there, we propose W.D. Wis. as the common forum. We believe this approach would further the interests of judicial efficiency and benefit all parties in avoiding logistical issues including the scheduling of multiple trials, claim construction hearings, and other scheduling conflicts, would be less disruptive to witnesses, and have other efficiency benefits as well as we move into the discovery phase in these actions and in the pending ITC actions between the parties. Please let us know Motorola Inc.'s and Motorola Mobility's position on this issue.

Best regards,

The logo for the law firm Weil, featuring the word "Weil" in white text on a green rectangular background.

**Steven Cherensky**

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