

Exhibit 4

to Motorola's Opening Claim Construction Brief

July 28, 2011

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Exhibit F – U.S. Patent No. 7,657,849

Motorola directly and/or indirectly infringes at least claims 1-10, 12-14, and 16-18 of U.S. Patent No. 7,657,849 (“the ’849 patent”), either literally or through the doctrine of equivalents. Motorola’s infringing products include mobile devices such as smartphones and tablet computers, including but not limited to the: Atrix, Bravo, Charm, Citrus, Cliq, Cliq XT, Cliq 2, Defy, Devour, Droid, Droid 2, Droid 2 Global, Droid X, Droid Pro, BackFlip, Flipout, Flipside, i1, and Xoom (collectively, “the ’849 Accused Products”).¹

For the purposes of this analysis, Apple will examine a representative mobile device, Motorola’s Droid 2, which operates with the Android FroYo 2.2 Platform. *See, e.g.*, Inv. 337-TA-750, Respondent Motorola Mobility, Inc.’s Second Amended and Supplemental Objections and Responses to Complainant Apple Inc.’s First Set of Interrogatories (May 10, 2011) [hereinafter “750 Interrogatory Responses”] at 20. As described in further detail below, Motorola’s Droid 2 infringes the asserted claims of the ’849 patent in at least two different ways: (1) by allowing a user to drag a slider with a lock-shaped icon across the screen to unlock the device² and (2) by allowing a user to draw a pattern to unlock the device.³ All other ’849 Accused Products meet the limitations of the asserted claims on the same or substantially similar bases as indicated for the Droid 2 unless otherwise stated.

In addition to Motorola’s direct infringement of the claims of the ’849 patent through its development, testing, manufacture and use of its devices, Motorola also indirectly infringes at least claims 1-10 of the ’849 patent. Manufacturers, retailers, distributors, end-users and others in the distribution channel of the ’849 Accused Products directly infringe this claim by using, selling, offering for sale, and/or importing these devices into the United States. Motorola contributes to and induces the infringement of asserted claim 1 through its promotion and provision of intentional marketing, sale and/or technical support of the ’849 Accused Products and associated specialized components in the United States, and through the intentional design, marketing, manufacture, sale, and/or technical support of the ’849 Accused Products abroad to induce direct infringement in the United States. Motorola supplies ’849 Accused 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 and user guides, which induces and results in direct infringement. *See, e.g.*, Motorola Droid 2 User Guide (WI-Apple0032860-32929). Upon information and belief, Motorola has known or should have

¹ Motorola has announced additional multitouch phones including XRT and Titanium which may also infringe the ’849 Patent. Apple reserves the right to supplement this analysis and this list of accused products as discovery into these newly announced products progresses.

² At least the Atrix, Bravo, Charm, Citrus, Cliq 2, Defy, Droid, Droid 2, Droid 2 Global, Droid X, Droid Pro, BackFlip, Flipout, Flipside, and i1 allow a user to drag a slider with a lock-shaped icon across the screen to unlock the device. The Xoom allows a user to drag a circle containing a lock-shaped icon across a portion of the screen to unlock the device.

³ All of the ’849 Accused Products allow a user to draw a pattern to unlock the device.

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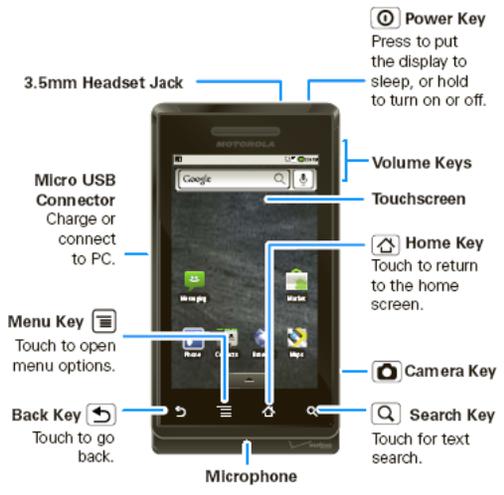
known that these actions would cause direct infringement of the '849 patent and did so with specific intent to encourage direct infringement. Additionally, the '849 Accused Products have no substantial non-infringing uses.

These infringement contentions are preliminary and based in part on publicly available information as to the '849 Accused Products. Motorola has not yet provided discovery as to its Accused Products in this action and in addition Apple's investigation of Motorola's infringement is ongoing. Based on discovery and Apples continued investigations Apple reserves the right to amend these contentions to identify additional bases for infringement and additional accused products, including products that Motorola may introduce in the future. Accordingly, Apple reserves its right to amend these contentions as discovery and its investigation proceeds.

U.S. Patent No. 7,657,849	Infringement Contentions
<p>1. A method of controlling an electronic device with a touch-sensitive display, comprising:</p>	<p>The '849 Accused Products include a touch sensor IC, which implements a method of processing input from a touch-sensitive surface. Motorola practices each and every step of this claim, induces users to perform such steps, and contributes to such use by selling the Accused Products and providing directions for their use.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.⁴</p> <p style="padding-left: 40px;"><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p style="padding-left: 40px;"><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

⁴ The Motorola Cliq, Cliq XT, Devour, Droid, Droid 2, i1, BackFlip, and Flipout use the Atmel ATMega324P. The Motorola Bravo, Cliq 2, Defy, Droid 2 Global, and Droid Pro use the Atmel ATmXT165. The Motorola Atrix, Charm, Citrus, Droid X, Flipside, and Xoom use the Atmel ATmXT224. The Motorola has not yet identified the touch sensor IC for the Motorola XRT or Titanium. *See, e.g.*, 750 Interrogatory Responses at 15-16.

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	 <p>The diagram shows a Motorola smartphone with the following components labeled:</p> <ul style="list-style-type: none"> 3.5mm Headset Jack: Located at the top left. Micro USB Connector: Located at the bottom left, used for charging or connecting to a PC. Menu Key: A square key with a list icon, used to open menu options. Back Key: A circular key with a left-pointing arrow, used to go back. Power Key: A circular key with a power symbol, used to put the display to sleep, or hold to turn on or off. Volume Keys: Two rectangular keys for volume control. Touchscreen: The main display area. Home Key: A square key with a house icon, used to return to the home screen. Camera Key: A square key with a camera icon. Search Key: A square key with a magnifying glass icon, used for text search. Microphone: Located at the bottom center.
<p>detecting contact with the touch-sensitive display while the device is in a user-interface lock state;</p>	<p>The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

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The '849 Accused Products detect contact with the touch-sensitive display while the device is in a user-interface lock state.

For example, the Droid 2 can detect contacts with its touch screen while in a user-interface lock state to make an emergency call or to unlock the device.

Emergency calls

Note: Your service provider programs one or more emergency phone numbers (such as 911 or 112) that you can call under any circumstances, even when your phone is locked. Emergency numbers vary by country. Your pre-programmed emergency number(s) may not work in all locations, and sometimes an emergency call cannot be placed due to network, environmental, or interference issues.

See WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032874.

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	<p>Screen lock</p> <p>Note: You can make emergency calls on a locked phone (see "Emergency calls" on page 13). A locked phone still rings, but you need to unlock it to answer.</p> <p>Lock the screen in the following ways:</p> <ul style="list-style-type: none"> • Press Power/Lock . • Let the screen time out (don't press anything). • Switch the power off. <p>To unlock the screen, press Power/Lock . Then, drag  to the right.</p> <p>Lock pattern</p> <p>To set the lock pattern, touch Menu  > Settings > Location & security.</p> <p>Follow the instructions to draw your lock pattern.</p> <p>When prompted, draw the pattern to unlock the phone.</p> <p>Passcode lock</p> <p>To set the passcode, touch Menu  > Settings > Location & security.</p> <p>Enter password, then confirm it.</p> <p>When prompted, enter the password to unlock the phone.</p> <p><i>See WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032912.</i></p>
moving an unlock image along a predefined displayed path on the touch-sensitive display in accordance	The '849 Accused Products allow a user to move a lock-shaped icon along a predefined displayed path on the touch screen.

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<p>with the contact, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<div data-bbox="766 261 1843 789" data-label="Image"></div> <p data-bbox="1178 808 1432 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="703 857 1885 930">The '849 Accused Products also allow a user to draw an unlock pattern in a predefined displayed path on the touch screen.</p>

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	<div data-bbox="741 264 1871 813" data-label="Image"> </div> <p align="center">(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p>
<p>transitioning the device to a user-interface unlock state if the detected contact corresponds to a predefined gesture; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

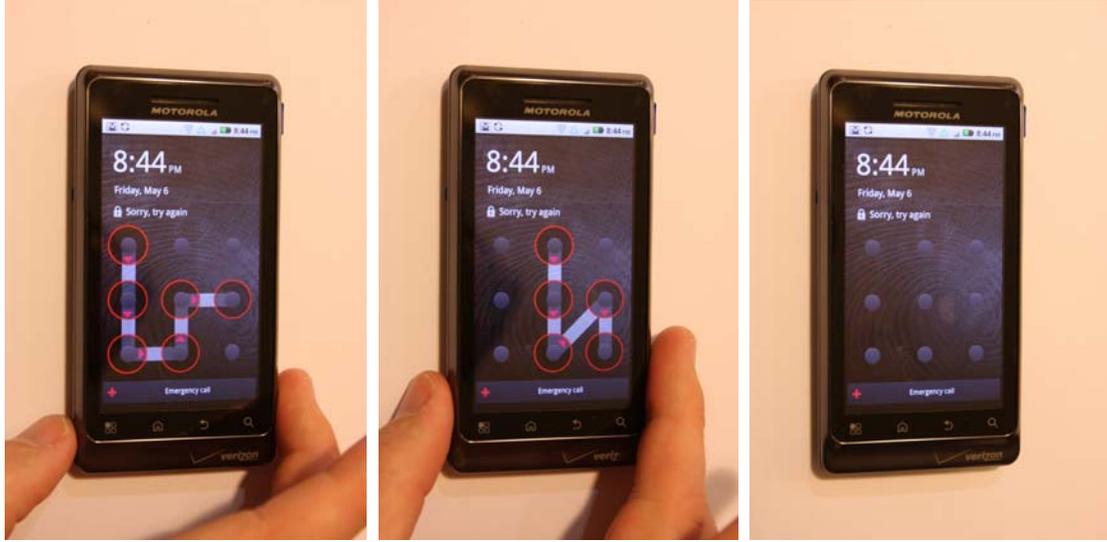
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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>maintaining the device in the user-interface lock state if the detected contact does not correspond to the predefined gesture.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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	<div data-bbox="768 264 1843 789" data-label="Image"></div> <p data-bbox="1178 808 1430 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="705 862 1885 930">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>2. The method of claim 1, further comprising, while the device is in the user-interface lock state, preventing the device from performing a predefined set of actions in response to detecting any contact with the touch-sensitive display that does not correspond to the predefined gesture.</p>	<p>The '849 Accused Products, while in a user-interface lock state, prevent the device from performing other actions in response to detecting contact with the touch-sensitive display that do not correspond to the predefined gesture.</p> <p>For example, the Droid 2 does not allow the user to make calls (other than emergency calls), use email or the internet or access any applications while in a user-interface lock state. Such actions are not accessible to the user until the device is unlocked to the home screen.</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java].</i></p>

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<p>3. The method of claim 1, wherein the predefined displayed path is a channel.</p>	<p>The '849 Accused Products utilize a predefined displayed path which is a channel.</p> <div data-bbox="766 316 1843 844" data-label="Image"> <p>The image consists of three side-by-side photographs of a Motorola Droid 2 smartphone. In each photo, a person's finger is shown touching the screen. The screen displays the time '8:41 PM' and the date 'Friday, May 6'. At the bottom of the screen, there is a lock icon and a right-pointing arrow. The finger is shown in the process of sliding from left to right across the bottom of the screen, which is the predefined path for unlocking the device.</p> </div> <p style="text-align: center;">(Photos of Droid 2)</p> <p><i>See also Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java].</i></p>
<p>4. The method of claim 1, wherein the detected contact is a movement of a point of contact across the touch-sensitive display while maintaining continuous contact with the touch-sensitive display.</p>	<p>The '849 Accused Products detect inputs on the touch screen while in a user-interface lock state and allow a user to unlock the device with a predefined gesture while the user maintains continuous contact with the touch screen.</p>

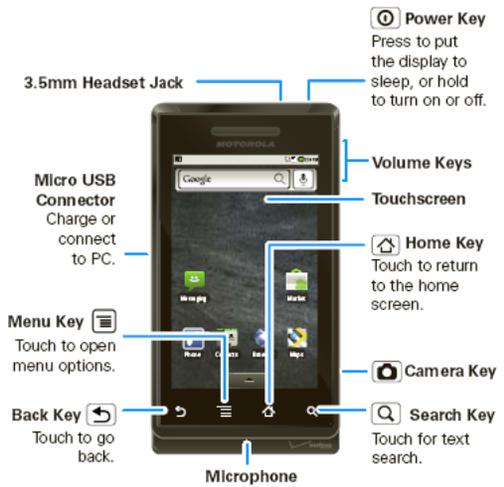
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	 <p data-bbox="1178 808 1430 841">(Photos of Droid 2)</p>  <p data-bbox="1178 1429 1430 1461">(Photos of Droid 2)</p>

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<p>5. The method of claim 4, wherein the movement of the point of contact across the touch-sensitive display while maintaining continuous contact with the touch-sensitive display is a horizontal movement.</p>	<p>The '849 Accused Products detect inputs on the touch screen while in a user-interface lock state and allow a user to unlock the device with a predefined gesture while the user maintains continuous contact with the touch screen in a horizontal direction.</p>  <p style="text-align: center;">(Photos of Droid 2)</p>
<p>6. A method of controlling a device comprising a touch-sensitive display, comprising:</p>	<p>The '849 Accused Products include a touch sensor IC, which implements a method of processing input from a touch-sensitive surface. Motorola practices each and every step of this claim, induces users to perform such steps, and contributes to such use by selling the Accused Products and providing directions for their use.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

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<p>displaying an unlock image on the touch-sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<p>The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p>

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	<div data-bbox="1129 266 1482 789" data-label="Image"></div> <p data-bbox="1186 808 1423 841" style="text-align: center;">(Photo of Droid 2)</p> <p data-bbox="703 862 1843 932">Similarly, the grid of dots where the user can draw a pattern is also an unlock image with which the user interacts to unlock the device (<i>i.e.</i>, by drawing the correct pattern).</p>

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	<div style="text-align: center;">  <p>(Photo of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>detecting contact with the touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</i></p>

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	<p style="text-align: center;"><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p> 
<p>transitioning the device to a user-interface unlock state if the detected contact corresponds to moving the unlock image along a predefined displayed path on the touch-sensitive display to a predefined location on the touch-sensitive display; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

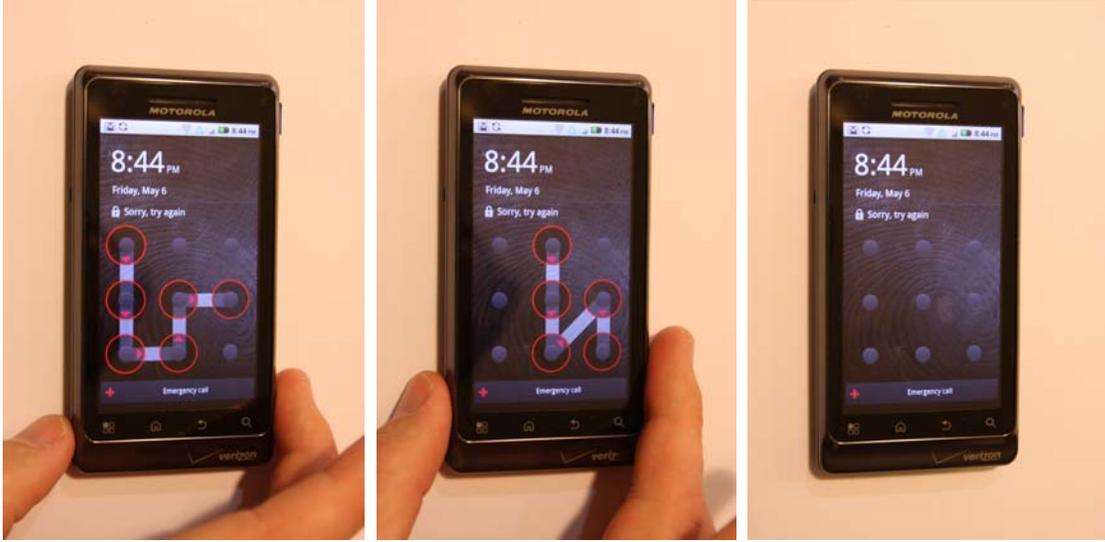
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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>maintaining the device in the user-interface lock state if the detected contact does not correspond to moving the unlock image along the predefined displayed path on the touch-sensitive display to the predefined location.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

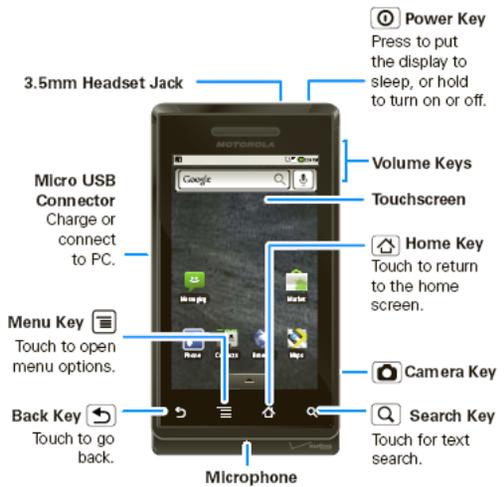
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	 <p data-bbox="1178 808 1432 841">(Photos of Droid 2)</p> <p data-bbox="703 862 1885 930">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>7. The method of claim 6, further comprising, while the device is in the user-interface lock state, preventing the device from performing a predefined set of actions in response to detecting any contact with the touch-sensitive display that does not correspond to moving the unlock image along the predefined displayed path on the touch-sensitive display to</p>	<p>The '849 Accused Products, while in the user-interface lock state, prevent the user from performing other actions in response to detecting contact with the touch-sensitive display that do not correspond to the predefined gesture.</p> <p>For example, the Droid 2 does not allow the user to make calls (other than emergency calls), use email or the internet or access any applications while in a user-interface lock state. Such actions are not accessible to the user until the device is unlocked to the home screen.</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/</i></p>

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the predefined location.	frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].
8. A method of controlling a device comprising a touch-sensitive display, comprising:	<p>The '849 Accused Products include a touch sensor IC, which implements a method of processing input from a touch-sensitive surface. Motorola practices each and every step of this claim, induces users to perform such steps, and contributes to such use by selling the Accused Products and providing directions for their use.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATmega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p> 
displaying an unlock image on the touch-sensitive display while the	The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-

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<p>device is in a user-interface lock state, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<p>interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p> <div data-bbox="1129 402 1482 932" data-label="Image"></div> <p style="text-align: center;">(Photo of Droid 2)</p> <p>Similarly, the grid of dots where the user can draw a pattern is also an unlock image with which the user interacts to unlock the device (<i>i.e.</i>, by drawing the correct pattern).</p>

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	<div data-bbox="1125 261 1486 802" data-label="Image"> </div> <p data-bbox="1188 818 1423 850" style="text-align: center;">(Photo of Droid 2)</p> <p data-bbox="705 873 1906 1089"><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p>
<p data-bbox="184 1112 611 1182">detecting contact with the touch-sensitive display; and</p>	<p data-bbox="705 1125 1864 1195">The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p data-bbox="705 1214 1871 1284">The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p data-bbox="789 1304 1871 1446"><i>See Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</i></p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<p style="text-align: center;"><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p> 
<p>transitioning the device to a user-interface unlock state if the detected contact corresponds to moving the unlock image across the touch-sensitive display according to a predefined displayed path on the touch-sensitive display; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

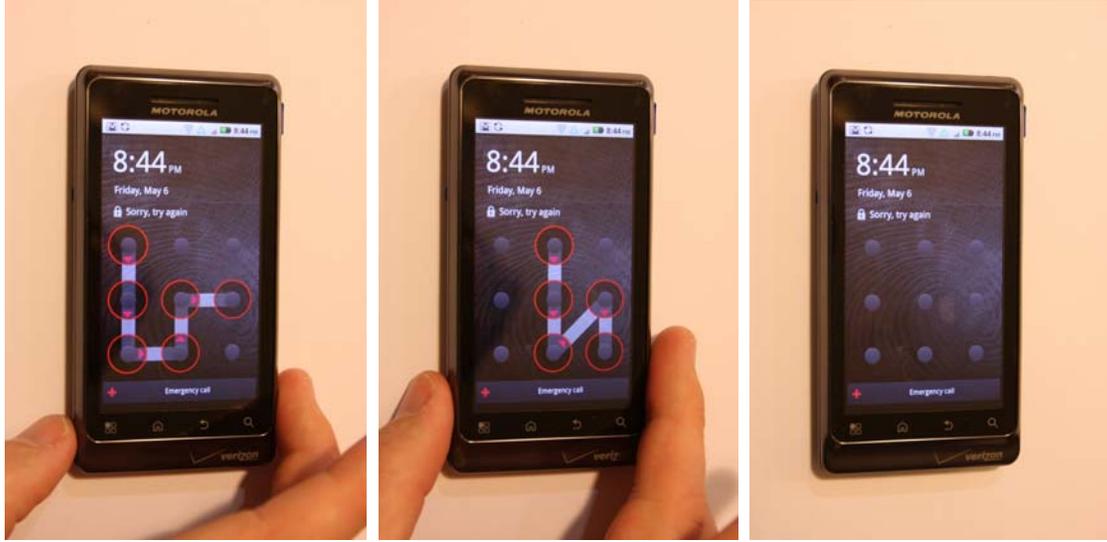
**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
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U.S. Patent No. 7,657,849	Infringement Contentions
	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>maintaining the device in the user-interface lock state if the detected contact does not correspond to moving the unlock image across the touch-sensitive display according to the predefined displayed path.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	 <p data-bbox="1178 808 1430 841">(Photos of Droid 2)</p> <p data-bbox="703 862 1885 930">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1</i> [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</p> </div>
<p>9. The method of claim 8, further comprising, while the device is in a user-interface lock state, preventing the device from performing a predefined set of actions in response to detecting any contact with the touch-sensitive display that does not correspond to moving the unlock image across the touch-sensitive display according to the predefined</p>	<p>The '849 Accused Products, while in the user-interface lock state, prevent the user from performing other actions in response to detecting contact with the touch-sensitive display that do not correspond to the predefined gesture.</p> <p>For example, the Droid 2 does not allow the user to make calls (other than emergency calls), use email or the internet or access any applications while in a user-interface lock state. Such actions are not accessible to the user until the device is unlocked to the home screen.</p> <p><i>See also Exhibit F-1</i> [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/</p>

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displayed path.	frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].
<p>10. The method of claim 8, wherein the detected contact corresponding to moving the unlock image across the touch-sensitive display according the predefined displayed path comprises contact corresponding to moving the unlock image across the touch-sensitive display to an endpoint of the predefined displayed path.</p>	<p>The '849 Accused Products require that the user complete the entire unlock gesture (i.e., moving the unlock image across the touch-sensitive display to an endpoint of the predefined displayed path) in order to unlock the device.</p> <p>For example, in the Droid 2, if the user does not drag the lock-shaped icon sufficiently across the screen (e.g., past the threshold point), the device will remain locked.</p> <div style="text-align: center;">  <p>(Photos of Droid 2)</p> </div> <p>If the user successfully moves the lock-shaped icon across the touch screen to the endpoint of the predefined path (i.e., the threshold point), however, the device will unlock.</p>

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	 <p data-bbox="1184 805 1430 834">(Photos of Droid 2)</p> <p data-bbox="705 857 1850 964">Similarly, unless and until the user draws the complete unlock pattern, the device will not unlock. In other words, the user must successfully complete drawing of the pattern (<i>i.e.</i>, reach the endpoint of the predefined displayed path) in order to unlock the device.</p>

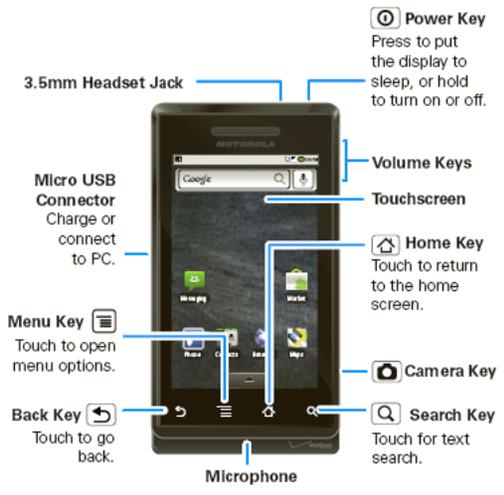
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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="743 266 1871 813" data-label="Image"> </div> <p style="text-align: center;">(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p>
<p>12. A portable electronic device, comprising:</p>	<p>The '849 Accused Products are portable electronic devices. Specifically, the accused mobile devices include smartphones and tablet computers.</p> <p><i>See, e.g. WI-Apple0032860-929 [Droid 2 User Guide].</i></p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="1136 266 1476 764" data-label="Image"> </div> <p data-bbox="1188 781 1423 813" style="text-align: center;">(Photo of Droid 2)</p>
<p>a touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

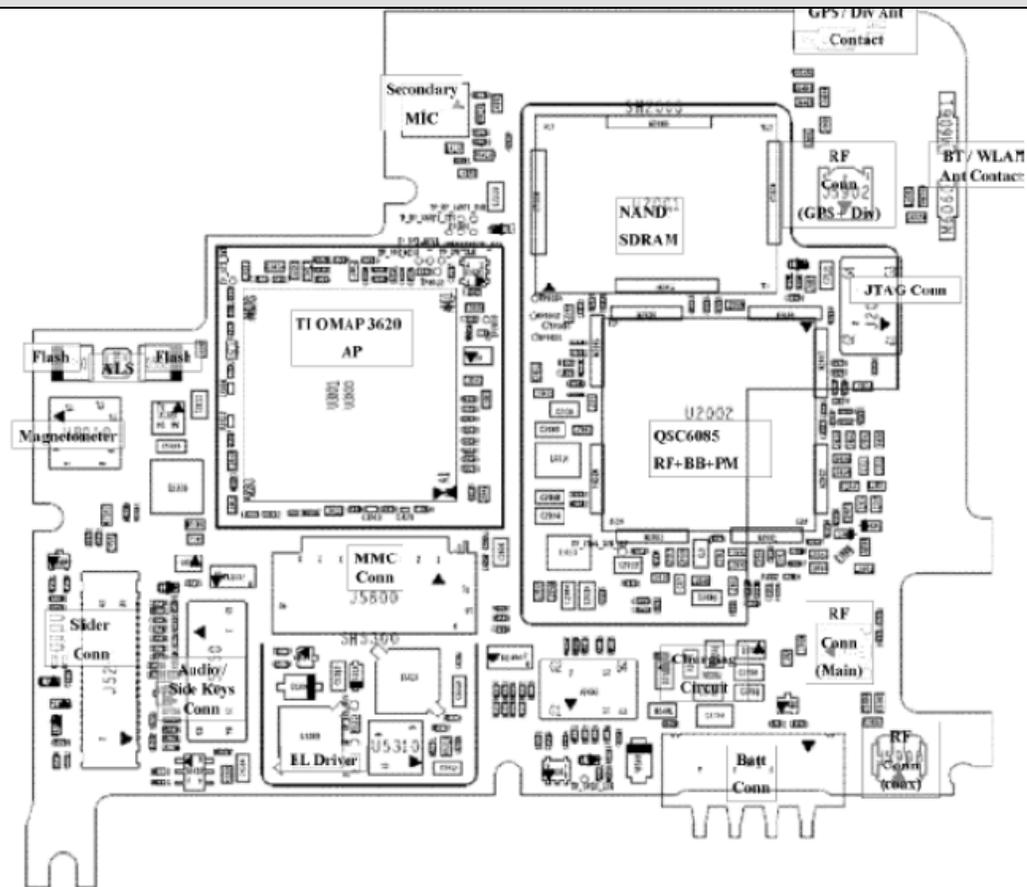
**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
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U.S. Patent No. 7,657,849	Infringement Contentions
	 <p>3.5mm Headset Jack</p> <p>Micro USB Connector Charge or connect to PC.</p> <p>Menu Key Touch to open menu options.</p> <p>Back Key Touch to go back.</p> <p>Power Key Press to put the display to sleep, or hold to turn on or off.</p> <p>Volume Keys</p> <p>Touchscreen</p> <p>Home Key Touch to return to the home screen.</p> <p>Camera Key</p> <p>Search Key Touch for text search.</p> <p>Microphone</p>
memory;	<p>The '849 Accused Products include memory.</p> <p>For example, the Droid 2 includes both NAND flash and SDRAM memory.</p>

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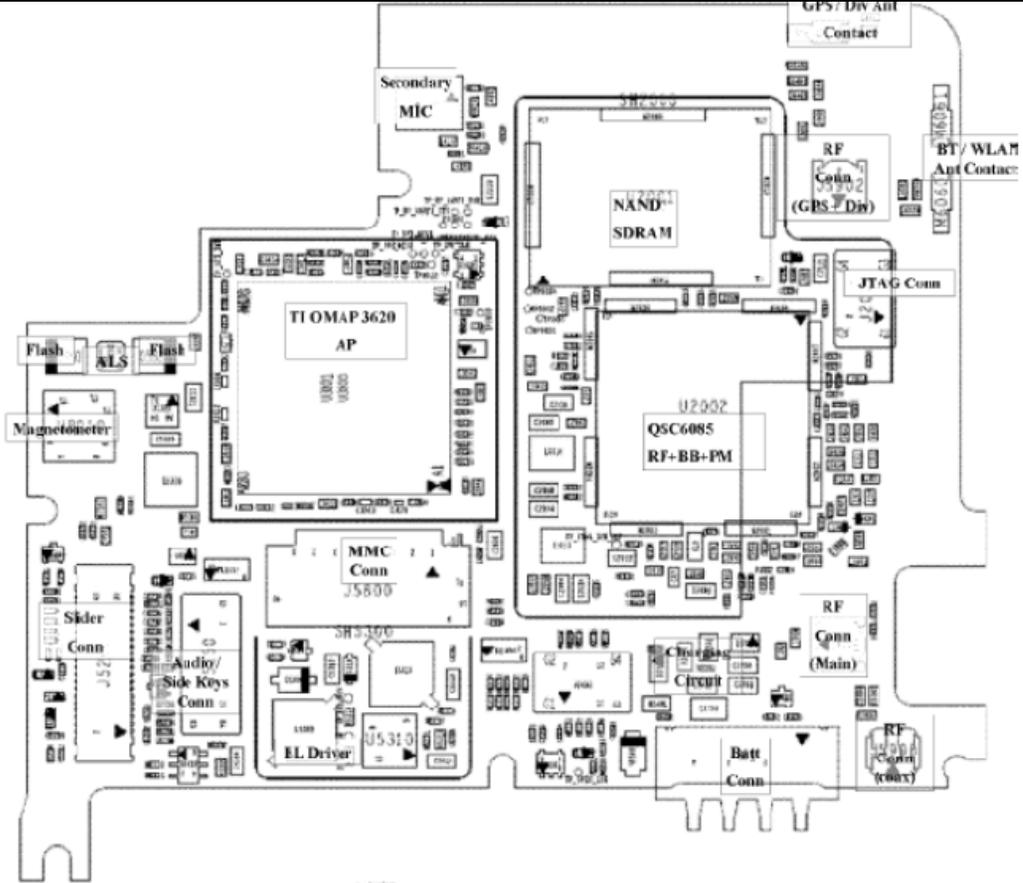
See Moto-Apple-0001291356.

As described below, the Droid 2 has a Texas Instrument OMAP 3630 Applications Processor which includes a memory interface.

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	<p>3.4.2 OMAP 3620 Memory Interface</p> <p>OMAP 3620 interfaces to two memory devices:</p> <ul style="list-style-type: none"> • 4G bits DDR RAM POP memory (U3000). Operating at 200 MHz clock with 32-bit wide bus • 8G bytes EMMC memory (U1300). Operating at 48MHz clock with 8-bit wide bus <p><i>See e.g.</i>, MOTO-APPLE-0004350525-27; MOTO-APPLE -0006037953_94205; MOTO-APPLE-0003671386-0003671600; MOTO-APPLE-0000439458; MOTO-APPLE-0002031226.</p>
<p>one or more processors;</p>	<p>The '849 Accused Products include one or more processors.</p> <p>For example, in addition to the aforementioned Atmel processor, the Droid 2 has an OMAP Application Processor and associated hardware. The processor is a Texas Instrument OMAP 3630 Applications Processor. <i>See, e.g.</i>, MOTOAPPLE-0004103806; MOTO-APPLE-0004802947 (bill of materials for 0J89 and 0L51). The Texas Instrument OMAP 3630 Applications Processor contains memory containing software elements and other variables for programming the processing system. <i>See, e.g.</i>, MOTO-APPLE-0004802947 (bill of materials for 0J89 and 0L51).</p>

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	 <p data-bbox="703 1161 1102 1193"><i>See Moto-Apple-0001291356.</i></p>
<p>and one or more modules stored in the memory and configured for execution by the one or more processors, the one or more modules including instructions to set the device to a user-interface lock state;</p>	<p>The '849 Accused Products include source code stored in the memory and configured for execution by the processors that include instructions to set the device to a user-interface lock state.</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java].</i></p>

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<p>to display an unlock image on the touch-sensitive display while the device is in the user-interface lock state, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device; to detect contact with the touch-sensitive display;</p>	<p>The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p> <div data-bbox="1129 477 1482 1003" data-label="Image">A photograph of a Motorola Droid 2 smartphone held in a person's hands. The screen displays the time 8:41 PM, the date Friday, May 6, and a lock icon on the left side of the screen.</div> <p style="text-align: center;">(Photo of Droid 2)</p> <p>Similarly, the grid of dots where the user can draw a pattern is also an unlock image with which the user interacts to unlock the device (<i>i.e.</i>, by drawing the correct pattern).</p>

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	<div data-bbox="1129 261 1486 802" data-label="Image"> </div> <p data-bbox="1188 818 1423 850" style="text-align: center;">(Photo of Droid 2)</p> <p data-bbox="701 873 1913 1089"><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p>
<p data-bbox="184 1112 667 1243">to move the unlock image along a predefined displayed path on the touch-sensitive display in accordance with the contact;</p>	<p data-bbox="701 1112 1885 1179">The '849 Accused Products allow a user to move a lock-shaped icon along a predefined displayed path on the touch screen.</p>

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	 <p data-bbox="1178 808 1430 841">(Photos of Droid 2)</p> <p data-bbox="705 862 1885 930">The '849 Accused Products also allow a user to draw an unlock pattern in a predefined displayed path on the touch screen.</p>

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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</p> </div>
<p>to transition the device to a user-interface unlock state if the detected contact corresponds to a predefined gesture; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

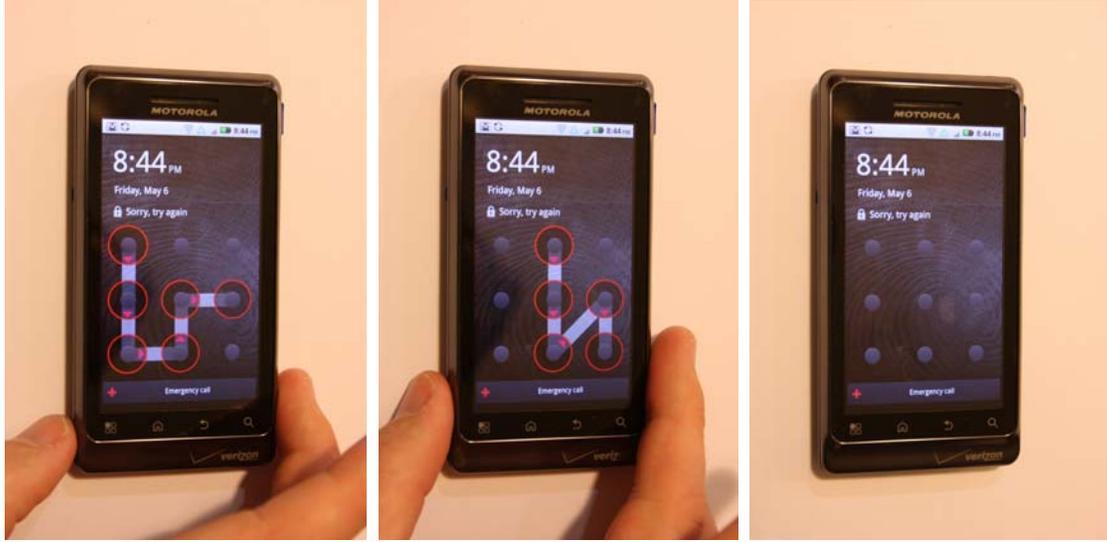
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<p>and to maintain the device in the user-interface lock state if the detected contact does not correspond to the predefined gesture.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="768 264 1843 789" data-label="Image"></div> <p data-bbox="1178 808 1430 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="705 862 1885 930">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

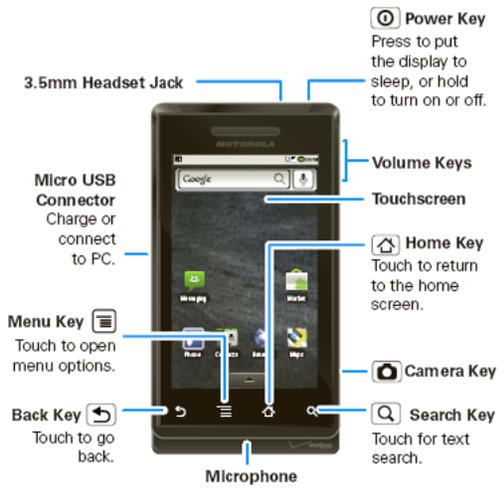
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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>13. A portable electronic device, comprising:</p>	<p>The '849 Accused Products are portable electronic devices. Specifically, the accused mobile devices include smartphones and tablet computers.</p> <p><i>See, e.g. WI-Apple0032860-929 [Droid 2 User Guide].</i></p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="1136 266 1474 764" data-label="Image"> </div> <p data-bbox="1186 781 1423 813" style="text-align: center;">(Photo of Droid 2)</p>
<p>a touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

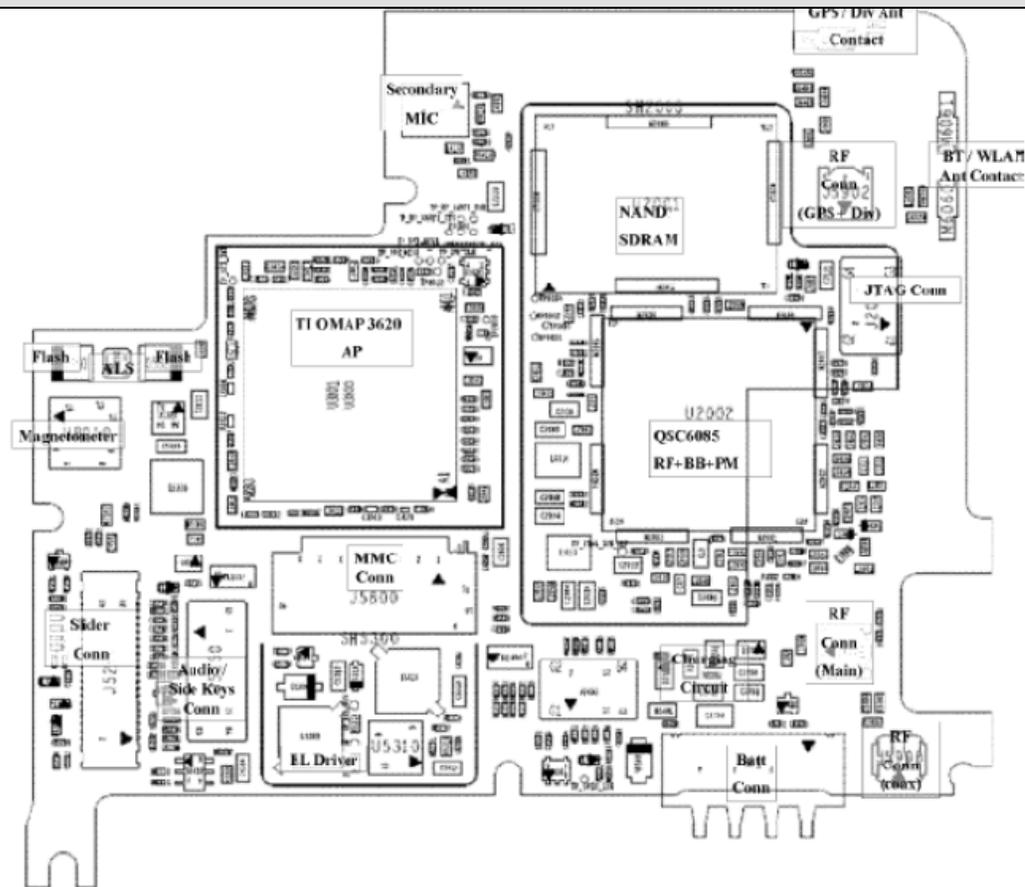
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	 <p>The diagram shows a Motorola Droid 2 smartphone with the following labeled components and their functions:</p> <ul style="list-style-type: none"> 3.5mm Headset Jack: Located at the top left. Micro USB Connector: Located at the bottom left, used for charging or connecting to a PC. Menu Key: A square key with a list icon, used to open menu options. Back Key: A circular key with a left-pointing arrow, used to go back. Power Key: A circular key with a power symbol, used to put the display to sleep, hold to turn on or off. Volume Keys: Two rectangular keys on the right side for volume control. Touchscreen: The main display area. Home Key: A square key with a house icon, used to return to the home screen. Camera Key: A square key with a camera icon, used to launch the camera. Search Key: A square key with a magnifying glass icon, used for text search. Microphone: Located at the bottom center.
memory;	<p>The '849 Accused Products include memory.</p> <p>For example, the Droid 2 includes both NAND flash and SDRAM memory.</p>

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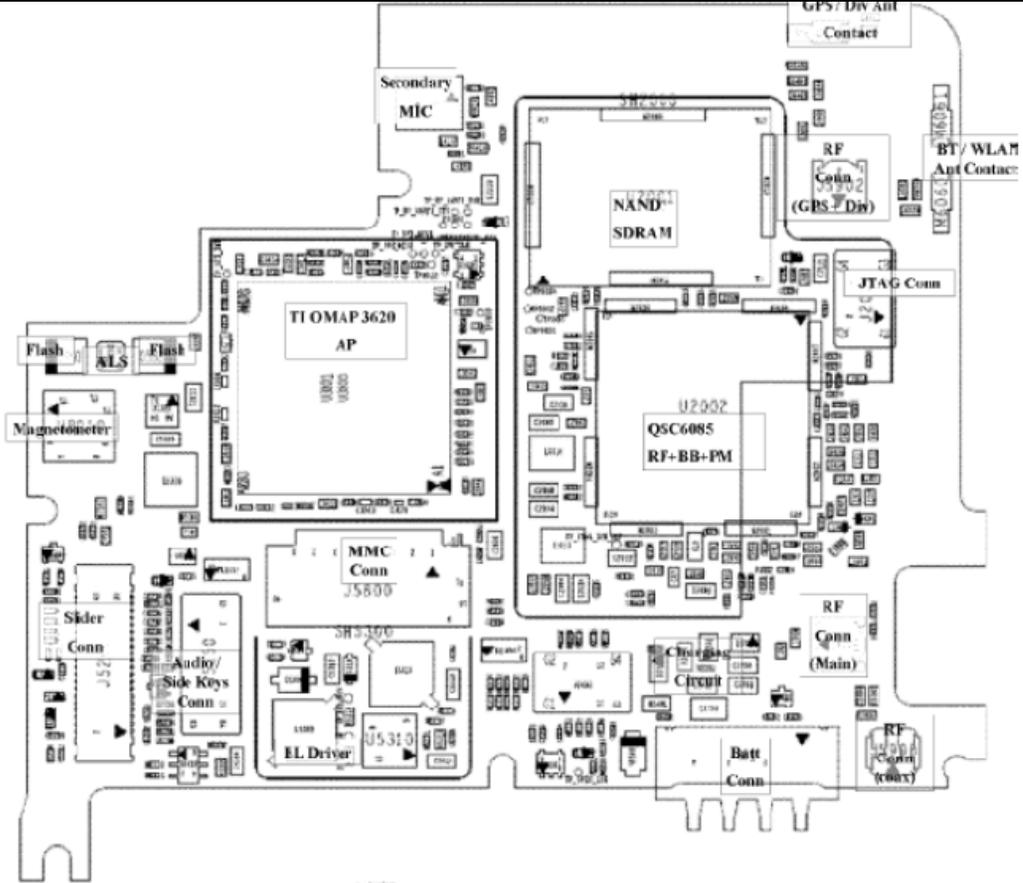
See Moto-Apple-0001291356.

As described below, the Droid 2 has a Texas Instrument OMAP 3630 Applications Processor which includes a memory interface.

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U.S. Patent No. 7,657,849	Infringement Contentions
	<p>3.4.2 OMAP 3620 Memory Interface</p> <p>OMAP 3620 interfaces to two memory devices:</p> <ul style="list-style-type: none"> • 4G bits DDR RAM POP memory (U3000). Operating at 200 MHz clock with 32-bit wide bus • 8G bytes EMMC memory (U1300). Operating at 48MHz clock with 8-bit wide bus <p><i>See e.g.</i>, MOTO-APPLE-0004350525-27; MOTO-APPLE -0006037953_94205; MOTO-APPLE-0003671386-0003671600; MOTO-APPLE-0000439458; MOTO-APPLE-0002031226.</p>
one or more processors;	<p>The '849 Accused Products include one or more processors.</p> <p>For example, in addition to the aforementioned Atmel processor, the Droid 2 has an OMAP Application Processor and associated hardware. The processor is a Texas Instrument OMAP 3630 Applications Processor. <i>See, e.g.</i>, MOTOAPPLE-0004103806; MOTO-APPLE-0004802947 (bill of materials for 0J89 and 0L51). The Texas Instrument OMAP 3630 Applications Processor contains memory containing software elements and other variables for programming the processing system. <i>See, e.g.</i>, MOTO-APPLE-0004802947 (bill of materials for 0J89 and 0L51).</p>

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	 <p data-bbox="703 1161 1102 1193"><i>See Moto-Apple-0001291356.</i></p>
<p>and one or more modules stored in the memory and configured for execution by the one or more processors, the one or more modules including instructions: to set the device to a user-interface lock state;</p>	<p>The '849 Accused Products include source code stored in the memory and configured for execution by the processors that include instructions to set the device to a user-interface lock state.</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java].</i></p>

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<p>to display an unlock image on the touch-sensitive display while the device is in the user-interface lock state, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<p>The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p> <div data-bbox="1129 477 1482 1003" data-label="Image"></div> <p style="text-align: center;">(Photo of Droid 2)</p> <p>Similarly, the grid of dots where the user can draw a pattern is also an unlock image with which the user interacts to unlock the device (<i>i.e.</i>, by drawing the correct pattern).</p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div style="text-align: center;">  <p>(Photo of Droid 2)</p> <p><i>See also Exhibit F-1</i> [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</p> </div>
<p>to detect contact with the touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<p style="text-align: center;"><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p> 
<p>to transition the device to a user-interface unlock state if the detected contact corresponds to moving the unlock image along a predefined displayed path on the touch-sensitive display to a predefined location on the touch-sensitive display; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

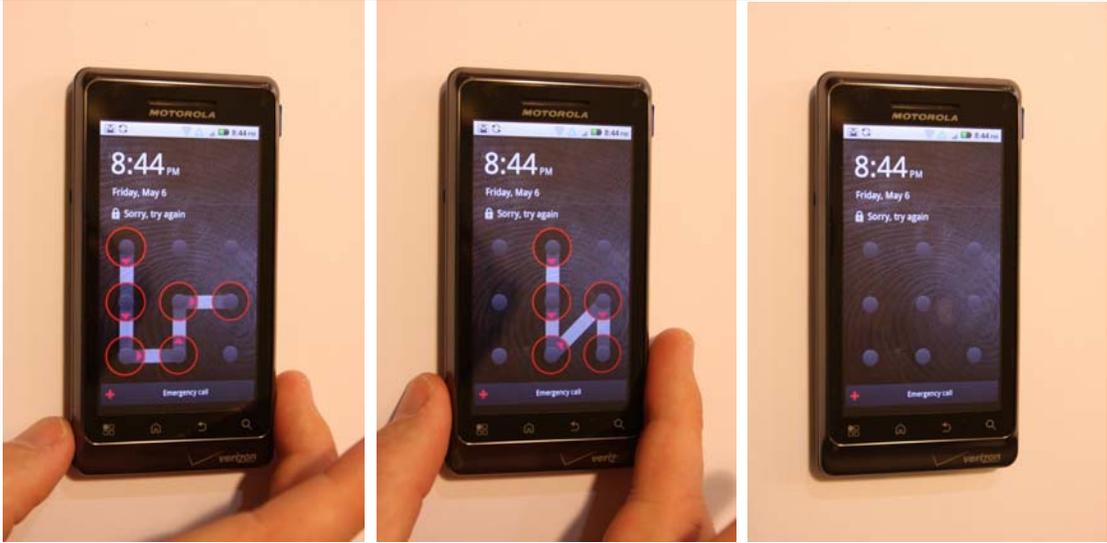
**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
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U.S. Patent No. 7,657,849	Infringement Contentions
	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>to maintain the device in the user-interface lock state if the detected contact does not correspond to moving the unlock image along the predefined displayed path on the touch-sensitive display to the predefined location.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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	<div data-bbox="766 264 1843 789" data-label="Image"></div> <p data-bbox="1171 808 1432 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="701 862 1885 932">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

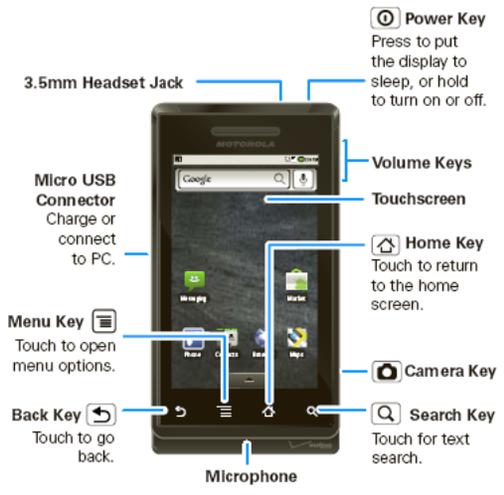
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U.S. Patent No. 7,657,849	Infringement Contentions
	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>14. A portable electronic device, comprising:</p>	<p>The '849 Accused Products are portable electronic devices. Specifically, the accused mobile devices include smartphones and tablet computers.</p> <p><i>See, e.g. WI-Apple0032860-929 [Droid 2 User Guide].</i></p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="1136 266 1474 764" data-label="Image"> </div> <p data-bbox="1186 781 1423 813" style="text-align: center;">(Photo of Droid 2)</p>
<p>a touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

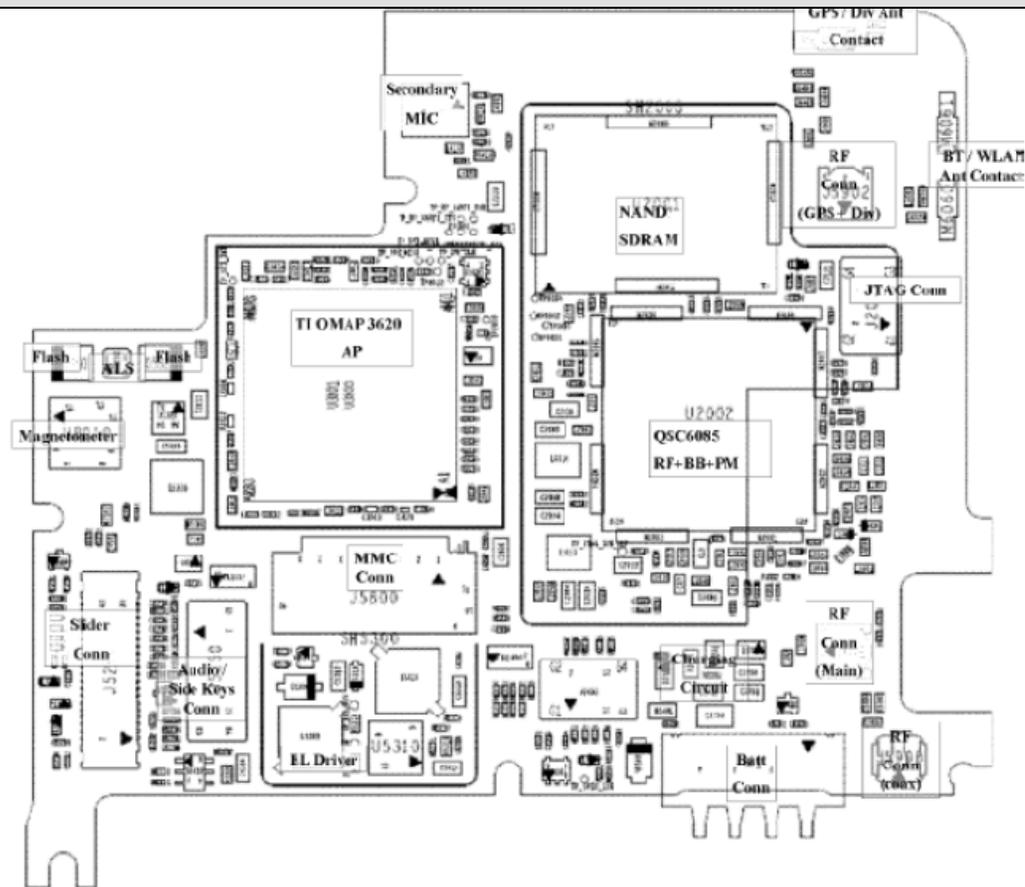
**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
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U.S. Patent No. 7,657,849	Infringement Contentions
	 <p>3.5mm Headset Jack</p> <p>Micro USB Connector Charge or connect to PC.</p> <p>Menu Key Touch to open menu options.</p> <p>Back Key Touch to go back.</p> <p>Power Key Press to put the display to sleep, or hold to turn on or off.</p> <p>Volume Keys</p> <p>Touchscreen</p> <p>Home Key Touch to return to the home screen.</p> <p>Camera Key</p> <p>Search Key Touch for text search.</p> <p>Microphone</p>
memory;	<p>The '849 Accused Products include memory.</p> <p>For example, the Droid 2 includes both NAND flash and SDRAM memory.</p>

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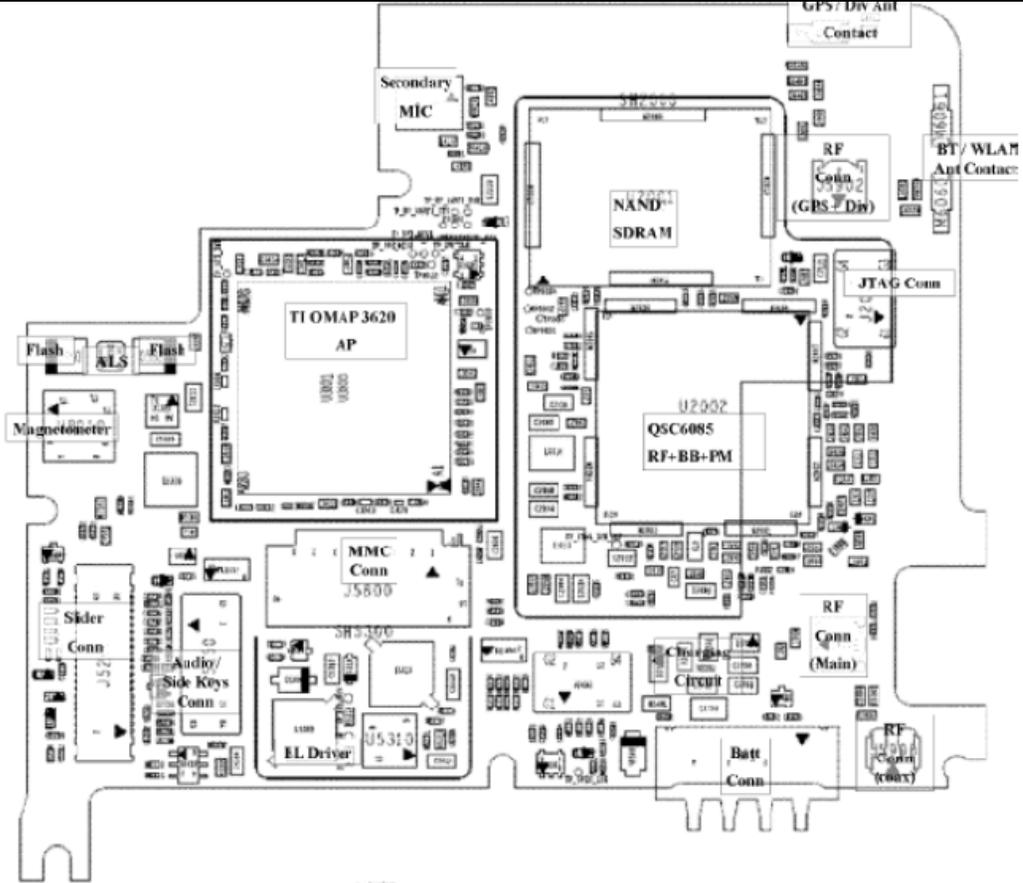
See Moto-Apple-0001291356.

As described below, the Droid 2 has a Texas Instrument OMAP 3630 Applications Processor which includes a memory interface.

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	<p>3.4.2 OMAP 3620 Memory Interface</p> <p>OMAP 3620 interfaces to two memory devices:</p> <ul style="list-style-type: none"> • 4G bits DDR RAM POP memory (U3000). Operating at 200 MHz clock with 32-bit wide bus • 8G bytes EMMC memory (U1300). Operating at 48MHz clock with 8-bit wide bus <p><i>See e.g.</i>, MOTO-APPLE-0004350525-27; MOTO-APPLE -0006037953_94205; MOTO-APPLE-0003671386-0003671600; MOTO-APPLE-0000439458; MOTO-APPLE-0002031226.</p>
one or more processors;	<p>The '849 Accused Products include one or more processors.</p> <p>For example, in addition to the aforementioned Atmel processor, the Droid 2 has an OMAP Application Processor and associated hardware. The processor is a Texas Instrument OMAP 3630 Applications Processor. <i>See, e.g.</i>, MOTOAPPLE-0004103806; MOTO-APPLE-0004802947 (bill of materials for 0J89 and 0L51). The Texas Instrument OMAP 3630 Applications Processor contains memory containing software elements and other variables for programming the processing system. <i>See, e.g.</i>, MOTO-APPLE-0004802947 (bill of materials for 0J89 and 0L51).</p>

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	 <p data-bbox="703 1161 1102 1193"><i>See Moto-Apple-0001291356.</i></p>
<p>and one or more modules stored in the memory and configured for execution by the one or more processors, the one or more modules including instructions: to set the device to a user-interface lock state;</p>	<p>The '849 Accused Products include source code stored in the memory and configured for execution by the processors that include instructions to set the device to a user-interface lock state.</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java].</i></p>

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<p>to display an unlock image on the touch-sensitive display while the device is in the user-interface lock state;</p>	<p>The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p> <div data-bbox="1129 477 1482 1003" data-label="Image"></div> <p style="text-align: center;">(Photo of Droid 2)</p> <p>Similarly, the grid of dots where the user can draw a pattern is also an unlock image with which the user interacts to unlock the device (<i>i.e.</i>, by drawing the correct pattern).</p>

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	<div style="text-align: center;">  <p>(Photo of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>to detect contact with the touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</i></p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<p style="text-align: center;"><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p> 
<p>to transition the device to a user-interface unlock state if the detected contact corresponds to moving the unlock image across the touch-sensitive display according to a predefined displayed path on the touch-sensitive display; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

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	<div data-bbox="1125 261 1486 805" data-label="Image"> </div> <p data-bbox="1178 824 1430 857" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="701 878 1913 1092"><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p>
<p data-bbox="184 1117 653 1326">to maintain the device in the user-interface lock state if the detected contact does not correspond to moving the unlock image across the touch-sensitive display according to the predefined displayed path.</p>	<p data-bbox="701 1117 1877 1182">The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p data-bbox="701 1203 1864 1268">For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="768 264 1843 789" data-label="Image"></div> <p data-bbox="1178 808 1430 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="705 862 1885 930">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

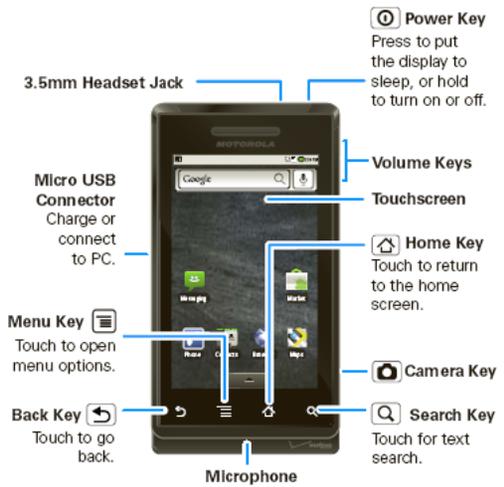
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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>16. A portable electronic device, comprising:</p>	<p>The '849 Accused Products are portable electronic devices. Specifically, the accused mobile devices include smartphones and tablet computers.</p> <p><i>See, e.g. WI-Apple0032860-929 [Droid 2 User Guide].</i></p>

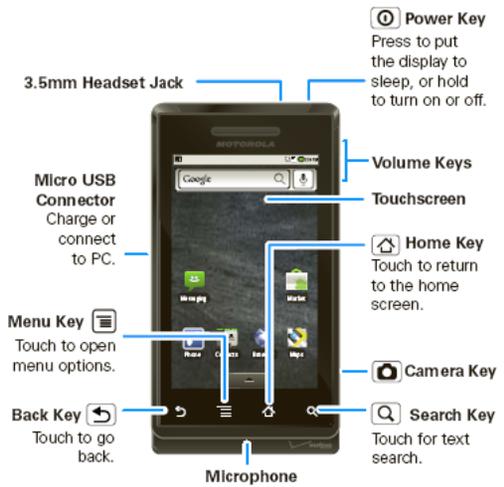
**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="1136 266 1474 764" data-label="Image"> </div> <p data-bbox="1186 781 1423 813" style="text-align: center;">(Photo of Droid 2)</p>
<p>a touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

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	 <p>The diagram shows a Motorola smartphone with the following components labeled:</p> <ul style="list-style-type: none"> 3.5mm Headset Jack: Located at the top left. Micro USB Connector: Located at the bottom left, used for charging or connecting to a PC. Menu Key: A square key with a list icon, used to open menu options. Back Key: A circular key with a left-pointing arrow, used to go back. Power Key: A circular key with a power symbol, used to put the display to sleep or hold to turn on/off. Volume Keys: Two keys (up and down) used for volume control. Touchscreen: The main display area. Home Key: A square key with a house icon, used to return to the home screen. Camera Key: A square key with a camera icon, used for taking photos. Search Key: A square key with a magnifying glass icon, used for text search. Microphone: Located at the bottom center.
<p>means for detecting contact with the touch-sensitive display while the device is in a user-interface lock state;</p>	<p>The '849 Accused Products include a touch sensor IC which detects contact with and processes input from a touch-sensitive surface and is also capable of detecting contact with the touch screen while the device is in a user-interface lock state.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div style="text-align: center;">  </div> <p>The '849 Accused Products detect contact with the touch-sensitive display while the device is in a user-interface lock state.</p> <p>For example, the Droid 2 can detect contacts with its touch screen while in a user-interface lock state to make an emergency call or to unlock the device.</p> <p style="color: blue;">Emergency calls</p> <p>Note: Your service provider programs one or more emergency phone numbers (such as 911 or 112) that you can call under any circumstances, even when your phone is locked. Emergency numbers vary by country. Your pre-programmed emergency number(s) may not work in all locations, and sometimes an emergency call cannot be placed due to network, environmental, or interference issues.</p> <p><i>See WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032874.</i></p>

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	<p>Screen lock</p> <p>Note: You can make emergency calls on a locked phone (see "Emergency calls" on page 13). A locked phone still rings, but you need to unlock it to answer.</p> <p>Lock the screen in the following ways:</p> <ul style="list-style-type: none"> • Press Power/Lock . • Let the screen time out (don't press anything). • Switch the power off. <p>To unlock the screen, press Power/Lock . Then, drag  to the right.</p> <p>Lock pattern</p> <p>To set the lock pattern, touch Menu  > Settings > Location & security.</p> <p>Follow the instructions to draw your lock pattern.</p> <p>When prompted, draw the pattern to unlock the phone.</p> <p>Passcode lock</p> <p>To set the passcode, touch Menu  > Settings > Location & security.</p> <p>Enter password, then confirm it.</p> <p>When prompted, enter the password to unlock the phone.</p> <p><i>See WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032912.</i></p>
<p>means for moving an unlock image along a predefined displayed path on the touch-sensitive display in</p>	<p>The '849 Accused Products allow a user to move a lock-shaped icon along a predefined displayed path on the touch screen.</p>

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<p>accordance with the contact, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<div data-bbox="768 264 1845 789" data-label="Image"></div> <p data-bbox="1178 808 1430 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="705 862 1885 930">The '849 Accused Products also allow a user to draw an unlock pattern in a predefined displayed path on the touch screen.</p>

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<p>means for transitioning the device to the user-interface unlock state if the detected contact corresponds to a predefined gesture; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

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<p data-bbox="186 1117 663 1256">means for maintaining the device in the user-interface lock state if the detected contact does not correspond to the predefined gesture.</p>	<p data-bbox="701 1117 1877 1182">The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p data-bbox="701 1203 1864 1273">For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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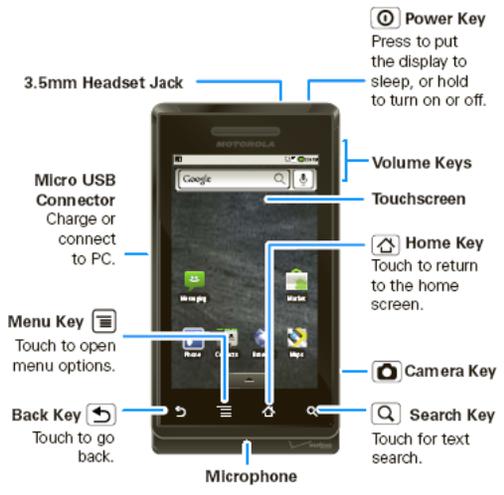
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	<div style="text-align: center;">  <p>(Photos of Droid 2)</p> <p><i>See also Exhibit F-1 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</i></p> </div>
<p>17. A portable electronic device, comprising:</p>	<p>The '849 Accused Products are portable electronic devices. Specifically, the accused mobile devices include smartphones and tablet computers.</p> <p><i>See, e.g. WI-Apple0032860-929 [Droid 2 User Guide].</i></p>

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U.S. Patent No. 7,657,849	Infringement Contentions
	<div data-bbox="1136 266 1474 764" data-label="Image"> </div> <p data-bbox="1186 781 1423 813" style="text-align: center;">(Photo of Droid 2)</p>
<p>a touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p> <p><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p>

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<p>means for displaying an unlock image on the touch-sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<p>The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p>

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	<div data-bbox="1129 266 1482 792" data-label="Image"></div> <p data-bbox="1184 808 1428 841" style="text-align: center;">(Photo of Droid 2)</p> <p data-bbox="701 862 1843 932">Similarly, the grid of dots where the user can draw a pattern is also an unlock image with which the user interacts to unlock the device (<i>i.e.</i>, by drawing the correct pattern).</p>

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	<div style="text-align: center;">  <p>(Photo of Droid 2)</p> <p><i>See also Exhibit F-1</i> [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/LockScreen.java]; Exhibit F-2 [Android2.2/frameworks/base/core/java/com/android/internal/widget/SlidingTab.java]; Exhibit F-3 [Android2.2/frameworks/policies/base/phone/com/android/internal/policy/impl/PatternUnlockScreen.java]; and Exhibit F-4 [Android2.2/frameworks/base/core/java/com/android/internal/widget/LockPatternView.java].</p> </div>
<p>means for detecting contact with the touch-sensitive display;</p>	<p>The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p>

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	<p style="text-align: center;"><i>See, e.g.</i> WI-Apple0032860 [Droid 2 User Guide] at WI-Apple0032863:</p> 
<p>means for transitioning the device to a user-interface unlock state if the detected contact corresponds to moving the unlock image along a predefined displayed path on the touch-sensitive display to a predefined location on the touch-sensitive display; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

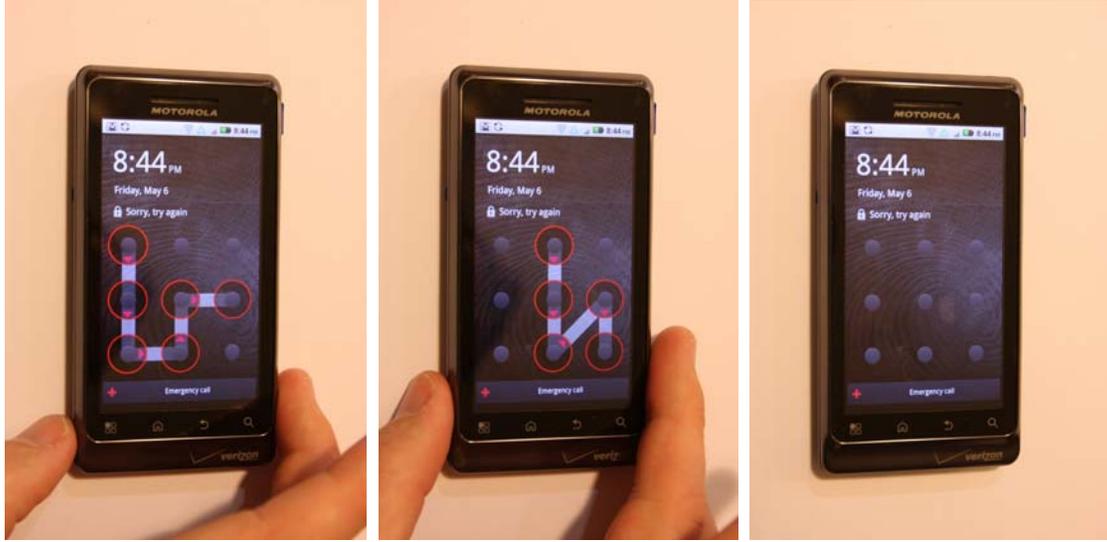
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<p>means for maintaining the device in the user-interface lock state if the detected contact does not correspond to moving the unlock image along the predefined displayed path on the touch-sensitive display to the predefined location.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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	<div data-bbox="768 264 1843 789" data-label="Image"></div> <p data-bbox="1178 808 1430 841" style="text-align: center;">(Photos of Droid 2)</p> <p data-bbox="705 862 1885 930">Similarly, in the Droid 2, if the user does not draw the correct pattern, the device will remain locked. In addition, the device will prompt the user to try again.</p>

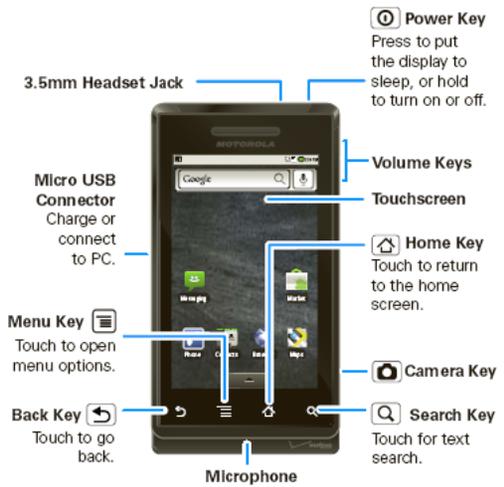
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<p>18. A portable electronic device, comprising:</p>	<p>The '849 Accused Products are portable electronic devices. Specifically, the accused mobile devices include smartphones and tablet computers.</p> <p><i>See, e.g.</i> WI-Apple0032860-929 [Droid 2 User Guide].</p>

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<p>means for displaying an unlock image on the touch-sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, interactive user-interface object with which a user interacts in order to unlock the device;</p>	<p>The '849 Accused Products display an unlock image on the touch sensitive display while the device is in a user-interface lock state, wherein the unlock image is a graphical, user-interface object with which the user interacts to unlock the device.</p> <p>For example, in the Droid 2, the image of a lock-shaped icon on the left side of the screen is an unlock image with which the user can interact.</p>

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<p>means for detecting contact with the touch-sensitive display; and</p>	<p>The '849 Accused Products include a touch sensor IC, which detects contact with and processes input from a touch-sensitive surface.</p> <p>The '849 Accused Products each contain a touch screen and an Atmel or Cypress processor for processing input from the touch screen.</p> <p><i>See</i> Moto-Apple-0005054173 [Atmel mXT224 Datasheet]; Moto-Apple0005055436 [Atmel mXT165 Datasheet]; Moto-Apple0005057911 [Atmel mXT1386 Datasheet]; Moto-Apple0005181710 [Atmel ATMega Datasheet]; Moto-Apple0005044548 [Cypress CY8CTMG200 Datasheet]</p>

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<p>means for transitioning the device to a user-interface unlock state if the detected contact corresponds to moving the unlock image across the touch-sensitive display according to a predefined displayed path on the touch-sensitive display; and</p>	<p>The '849 Accused Products transition to a user-interface unlock state if the detected contact corresponds to the predefined unlock gesture.</p> <p>For example, if the user successfully completes the predefined unlock gesture, the Droid 2 unlocks to the home screen.</p>

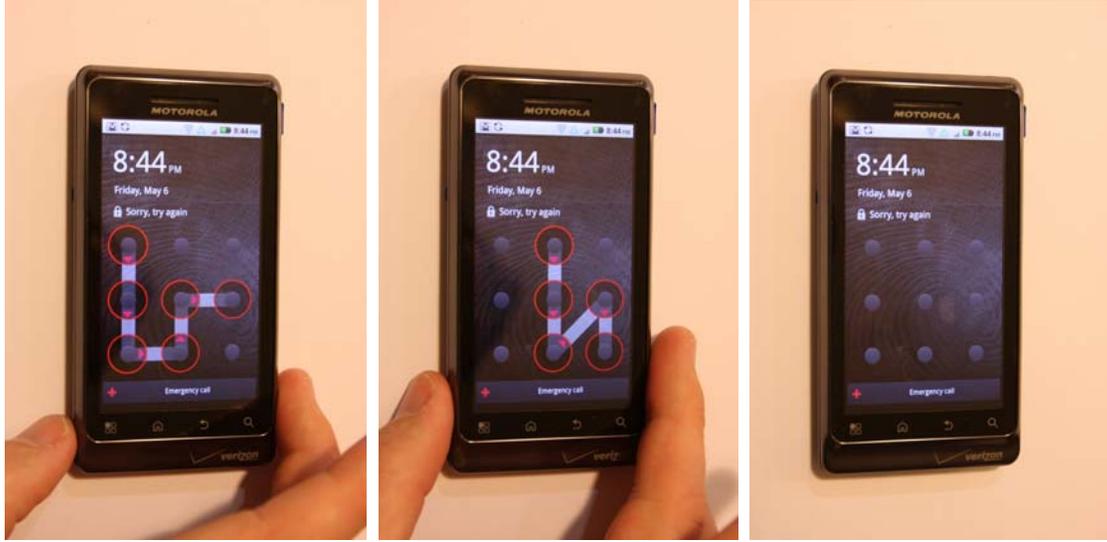
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<p>means for maintaining the device in the user-interface lock state if the detected contact does not correspond to moving the unlock image across the touch-sensitive display according to the predefined displayed path.</p>	<p>The '849 Accused Products maintain the device in a user-interface lock state if the detected contact with the touch screen does not correspond predefined unlock gesture.</p> <p>For example, in the Droid 2, if the user does not successfully drag the lock-shaped icon sufficiently across the screen (<i>e.g.</i>, past the threshold point), the device will remain locked.</p>

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