

# Exhibit B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:10-CIV-24063-MORENO

MOTOROLA MOBILITY, INC.,

Plaintiff,

vs.

MICROSOFT CORPORATION,

Defendant.

JURY TRIAL DEMANDED

RULE 26(a)(1) SECOND AMENDED AND UPDATED DISCLOSURES OF  
MICROSOFT CORPORATION

Defendant Microsoft Corporation (“Microsoft”) provides the following amended and updated disclosures pursuant to Rule 26(a)(1). Microsoft submits these disclosures based on its present state of knowledge and belief based on information now reasonably available to Microsoft. Discovery or other investigations in the future may reveal or disclose additional information. Microsoft expressly reserves the right to supplement and/or modify the disclosures under Rule 26(e) either formally or informally through the normal course of discovery (e.g., by producing documents, responding to interrogatories, or producing witnesses at depositions).

**I. Individuals Likely to Have Discoverable Information that Microsoft May Use to Support Its Claims or Defenses.**

Based on the allegations presented in Motorola Mobility, Inc.’s (“Motorola”) Complaint and the current status of Microsoft’s investigation, Microsoft believes that the following individuals are likely to have discoverable information that Microsoft may use to support its claims or defenses in this action. Microsoft anticipates that other individuals currently unknown may also have

discoverable information and specifically reserves the right to identify additional witnesses as discovery proceeds.

In the following tables, Microsoft provides the last known address and telephone number for each former employee for which it has located such information. All communications with Microsoft's current employees should be made only through counsel for Microsoft in this action. In addition, because Microsoft's former employees may be in possession of attorney-client privileged information and/or attorney work product and may be represented by counsel, Motorola should contact the undersigned counsel before attempting to communicate directly with any of Microsoft's former employees.

This disclosure is submitted with the understanding and belief that, at all times, a variance may exist in the level of knowledge and information held by potential witnesses identified for a subject matter area. It also may be learned, as discovery proceeds and issues in this action unfold, that one or more individuals may be more knowledgeable about relevant facts and issues than other individuals. For example, Microsoft expects to identify individuals potentially having knowledge of prior art patents, uses, publications, inventions, or other activities, and will supplement this disclosure as appropriate. By indicating the general subject matters as to which Microsoft now believes that a given individual may be knowledgeable, Microsoft is in no way limiting its right to call that individual to testify at trial or at deposition concerning other subjects.

In addition to the individuals identified below, Microsoft incorporates by reference any other individual who is identified in Motorola's Rule 26(a) disclosures or is deposed.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Michael Barnea	Willowdale, Ontario Canada (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,502,839; Motorola's business and products.
Senaka Balasuriya	63 West Fountainhead Dr. #209 Westmont, IL 60067 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,757,544; Motorola's business and products.
Charles Edward Batey, Jr.	7182 Charleston Point Dr. Lake Worth, FL 33467 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,784,001; Motorola's business and products.
R. Louis Breeden	Motorola, Inc. Intellectual Property Dept 5401 North Beach Street, MS E230 Fort Worth, TX 76137 (817) 245-4604	Prosecution of U.S. Patent No. 6,272,333.
Kevin A. Buford	Motorola, Inc. 1303 East Algonquin Road Schaumburg, IL 60196 (708) 576-5214	Prosecution of U.S. Patent No. 5,764,899.
Susanne Alysia Clark Cazzanti (former employee)	11870 SE 4 <sup>th</sup> Pl. #1002 Bellevue, WA 98005 (425) 462-8699	Conception and reduction to practice of U.S. Patent No. 6,897,853.
Sylvia Chen	Motorola, Inc. Law Department 600 North US Highway 4 5 Libertyville, IL 60048 (847) 523-2350	Prosecution of U.S. Patent No. 6,983,370.
Daniel C. Crilly	Motorola, Inc. Intellectual Property Department 1303 East Algonquin Road Schaumburg, IL 60196 (847) 576-6939	Prosecution of U.S. Patent No. 6,408,176.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Ryan Edward Cukierman (former employee)	16149 Redmond Way PMB #237 Redmond, WA 98052 (425) 417-6546	Conception and reduction to practice of U.S. Patent No. 6,897,853.
Walter L. Davis	7580 East Farm, Road 182 Rogersville, MO 65742 (telephone unknown)	Prior art to U.S. Patent No. 6,272,333.
Joan Deluca	550 S.W. 6th Avenue Boca Raton, FL 33486 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,784,001; Motorola's business and products.
Randi L Dulaney	Motorola, Inc. Intellectual Property Section Law Department 8000 West Sunrise Blvd Ft. Lauderdale, FL 33322 (954) 723-6449	Prosecution of U.S. Patent No. 6,983,370.
Eric Thomas Eaton	3198 Medinah Circle Lake Worth, FL 33467 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,983,370; Motorola's business and products.
Gene Eggleston	1303 Mink Trail Cary, IL 60013 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,764,899; Motorola's business and products.
John Friend	275 Galli Drive Los Altos, CA 94022 (650) 917-8084	Prior art, prosecution of U.S. Patent No. 5,764,899.
Kelly A. Gardner	Motorola, Inc. Intellectual Property Department 1500 Gateway Boulevard Boynton Beach, FL 33426 (407) 739-2860	Prosecution of U.S. Patent No. 5,784,001.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Gary W. Grube	2 Ridgcroft Lane Barrington, IL 60010 (telephone unknown)	Prior art to U.S. Patent No. 6,272,333.
Mitch Hansen	241 Foxmoor Fox River Grove, IL 60021 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,764,899; Motorola's business and products.
David Jeffery Hayes	7544 Wentworth Drive Lake Worth, FL 33467 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,983,370; Motorola's business and products.
Steven Horowitz (former employee)	1898 Robles Ranch Rd Los Altos, CA 94024 (650) 940-1110	Conception and reduction to practice of U.S. Patent No. 6,785,901.
Terri S. Hughes	Motorola, Inc. 1303 East Algonquin Road Schaumburg, IL 60196 (847) 576-5214	Prosecution of U.S. Patent No. 5,764,899.
Marieke Iwema (Watson) (former employee)	2244 W LK Sammamish Pkwy NE Redmond, Washington, 98052 (206) 714-2100	Conception and reduction to practice of U.S. Patent No. 6,897,853.
Jeffrey K. Jacobs	Motorola, Inc. Intellectual Property Department 1303 East Algonquin Road Schaumburg, IL 60196 (847) 576-5562	Prosecution of U.S. Patent No. 6,408,176.
Robert Jarrett	One Microsoft Way, Redmond, WA 98052, (425) 882-8080	Conception and reduction to practice of U.S. Patent No. 6,897,853.
David F. Jones	One Microsoft Way, Redmond, WA 98052, (425) 882-8080	Conception and reduction to practice of U.S. Patent Nos. 6,791,536 and 6,897,853.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Leroy Keely (former employee)	210 Gabarda Way Protola Valley, California, 94028 (650) 854-9120	Conception and reduction to practice of U.S. Patent Nos. 6,791,536 and 6,897,853.
Frank C. Kolnick	33 Nymark Avenue, Willowdale, Ontario Canada M2J 2G8 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,502,839; Motorola's business and products.
Douglas Kraul	7 Hovey Street Gloucester, MA 01930 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,784,001; Motorola's business and products; prior art to U.S. Patent No. 6,272,333.
David Ladd	5905 Springside Downers Grove, IL 60516 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,757,544; Motorola's business and products.
Shawn Domenic Loveland	One Microsoft Way, Redmond, WA 98052, (425) 882-8080	Conception and reduction to practice of U.S. Patent Nos. 7,024,214 and 7,493,130.
Charlton E. Lui (former employee)	13700 Marina Pointe Dr. Suite 1423 Marina Del Ray, California, 90292 (telephone unknown)	Conception and reduction to practice of U.S. Patent No. 6,897,853.
Scott A McKeown	Oblon, Spivak, McClelland, Maier & Neustadt, LLP 1940 Duke Street Alexandria, VA 22314 (703) 412-6297	Prosecution of U.S. Patent No. 5,764,899.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Jonathan P. Meyer	Motorola, Inc. Intellectual Property Department 1303 East Algonquin Road Schaumburg, IL 60196 (telephone unknown)	Prosecution of U.S. Patent No. 5,764,899 and 6,408,176.
Von Alan Mock	8114 Rose Marie Circle Boynton Beach, FL 33437 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,983,370; Motorola's business and products.
Motorola, Inc	Motorola, Inc. 1303 East Algonquin Road Schaumburg, IL 60196 (telephone unknown)	Prosecution of U.S. Patent Nos. 5,502,839, 5,764,899 and 6,408,176.
Motorola, Inc.	Motorola, Inc. Intellectual Property Department 1500 Gateway Boulevard Boynton Beach, FL 33426 (telephone unknown)	Prosecution of U.S. Patent No. 5,784,001.
Motorola, Inc.	Motorola, Inc. Intellectual Property Dept 5401 North Beach Street, MS E230 Fort Worth, TX 76137 (telephone unknown)	Prosecution of U.S. Patent No. 6,272,333.
Motorola, Inc.	Motorola, Inc. Law Department 600 North US Highway 45 Libertyville, IL 60048 (telephone unknown)	Prosecution of U.S. Patent Nos. 6,757,544 and 6,983,370.
Motorola Inc., Microcomputer Division	4250 East Camelback Road, Suite 300K Phoenix, AZ 85018 (telephone unknown)	Prosecution of U.S. Patent No. 5,502,839.
Harold C. McGurk IV	Motorola, Inc. Intellectual Property Department P.O. Box 10219 Scottsdale, AZ 85271 (602) 441-4207	Prosecution of U.S. Patent No. 5,502,839.



Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Eric Nelson	One Microsoft Way, Redmond, WA 98052, (425) 882-8080	Conception and reduction to practice of U.S. Patent No. 7,383,460.
Walter W. Nielsen	Motorola Inc., Microcomputer Division 4250 East Camelback Road, Suite 300K Phoenix, AZ 85018 (602) 952-4700	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,502,839; Motorola's business and products.
Oblon, Spivak, McClelland, Maier & Neustadt, LLP	1940 Duke Street Alexandria, VA 22314 (703)-413-3000	Prosecution of U.S. Patent No. 5,764,899.
S. Kevin Pickens	Motorola, Inc. Intellectual Property Department P.O. Box 10219 Scottsdale, AZ 85271 (602) 441 -4207	Prosecution of U.S. Patent No. 5,502,839.
Peter Potrebic (former employee)	378 Kortum Canyon Calistoga, California, 94515 (707) 942-8669	Conception and reduction to practice of U.S. Patent No. 6,897,904.
Jayanthi Rangarajan	222 E Pearson St. Chicago, IL 60611 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,757,544; Motorola's business and products.
Vincent J. Rauner	Motorola Inc., Microcomputer Division 4250 East Camelback Road, Suite 300K Phoenix, AZ 85018 (telephone unknown)	Prosecution of U.S. Patent No. 5,502,839.
Anthony Rzany	702 Silk Oak Lane Crystal Lake, IL 60014 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,764,899; Motorola's business and products.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Anthony J. Sarli, Jr.	Motorola, Inc. 1303 East Algonquin Road Schaumburg, IL 60196 (708) 576-0379	Prosecution of U.S. Patent No. 5,764,899.
Bruce J. Sherwin, Jr.	One Microsoft Way, Redmond, WA 98052, (425) 882-8080	Conception and reduction to practice of U.S. Patent No. 7,383,460.
Dwight Randall Smith	2132 Brownstone Court Grapevine, TX 76051 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,272,333; Motorola's business and products.
Geoffrey Smith (former employee)	572 Franklin St. Mountain View, California, 94041 (650) 965-7735	Conception and reduction to practice of U.S. Patent No. 6,897,904.
David Switzer (former employee)	1828A 25 <sup>th</sup> Ave. Seattle, Washington, 98122 (telephone unknown)	Conception and reduction to practice of U.S. Patent No. 6,791,536.
Michael Hin-cheung Tsang (former employee)	15818 SE 45 <sup>th</sup> Pl. Bellevue, WA 98006 (425) 644-8672	Conception and reduction to practice of U.S. Patent No. 6,791,536.
Curtis Tuckey	1217 W. Arthur Ave Chicago, IL 60626 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,757,544; Motorola's business and products.
Kamala D. Urs	861 Tallgrass Drive Bartlett, IL 60103 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 6,408,176; Motorola's business and products.
Randall S. Vaas	Motorola, Inc. Law Department 600 North US Highway 45 Libertyville, IL 60048 (847) 523-2327	Prosecution of U.S. Patent No. 6,757,544.

<b>Name</b>	<b>Address, Telephone No.</b>	<b>Subjects of Likely Discoverable Information.</b>
William Hong Vong	One Microsoft Way, Redmond, WA 98052, (425) 882-8080	Conception and reduction to practice of U.S. Patent No. 6,791,536.
Hisashi D. Watanabe	Motorola, Inc. Law Department 600 North US Highway 45 Libertyville, IL 60048 (847) 523-2322	Prosecution of U.S. Patent Nos. 5,764,899 and 6,757,544.
Bernhard P. Weisshaar	Toronto, Ontario Canada M6K 1A9 (telephone unknown)	Prior art, alleged conception and alleged reduction to practice of, prosecution of, alleged ownership of, and products, if any, allegedly embodying U.S. Patent No. 5,502,839; Motorola's business and products.
J. Ray Wood	Motorola, Inc. 1303 East Algonquin Road Schaumburg, IL 60196 (847) 576-5214	Prosecution of U.S. Patent No. 5,764,899.
Jeff Yaksick (former employee)	434 Bayview Ave Sunnyvale, California, 94085 (408) 739-5525	Conception and reduction to practice of U.S. Patent No. 6,785,901.
Michael Zazzara	Motorola, Inc. IP Law Department 1500 Gateway Boulevard Boynton Beach, FL 33426 (561) 739-3969	Prosecution of U.S. Patent No. 5,784,001.

In addition, Microsoft believes that the following additional individuals are likely to have discoverable information that Microsoft may use to support its claims or defenses in this action:

<b>Name</b>	<b>Address, Telephone No.</b>	<b>Subjects of Likely Discoverable Information.</b>
Rob Aldinger	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Windows Phone 7 and Silverlight Mobile.
Fil Alleva	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Microsoft's speech engine.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Marcus Ash	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Bing Maps on Windows Phone 7.
Carl W. Bell	Baylor University One Bear Place #97148 Waco, Texas 76798	Prior art to U.S. Patent No. 5,764,899.
Joe Binz	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Financial reporting of Exchange, Exchange ActiveSync, Lync and Unified Messaging.
Greg Bolles	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Exchange and Exchange ActiveSync.
Carl Brandt	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Licenses to the Microsoft patents in suit.
Neil Briskman	Motorola, Inc. 600 North US Highway 4 5 Libertyville, IL 60048 (847) 523-2350	Pricing of Motorola smartphones and mobile devices.
Todd Brix	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Marketing, sales, and product management of Windows Marketplace.
Glen Copping	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Financial reporting of Windows Mobile, which includes Windows Mobile 6.5 and Windows Phone 7.
Adam Czeisler	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Windows Live Messenger.
Adrian Dragomir	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Microsoft's implementation of the '214 and '130 patents issued to Shawn Domenic Loveland.
Stephanie Ferguson	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Business planning and product management of Windows Phone 7.
Abolade Gbadegesin	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Windows Marketplace.
Sam George	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Windows Presentation Foundation and Silverlight.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Anuj Gosalia	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Direct2D.
Kirk Gregerson	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Marketing, sales and product management of Lync and Unified Messaging.
Kathryn Griffith	PriceWaterhouse Coopers 1420 Fifth Avenue Suite 1900 Seattle, WA 98101	Financial information relating to the Microsoft accused products.
Amit Gupta	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Lync.
Ed Hott	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Discussions and negotiations with third parties regarding licensing and implementation of the Microsoft Exchange protocol.
Harish Jayanti	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Bing Maps.
Kevin Keith	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Windows Mobile marketing
Z.K. Kong	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Exchange.
Aidan Marcuss	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Marketing, sales, and product management of Windows 7.
Chris Matson	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Windows Phone 7 and Windows Mobile 6.5 OEM agreements.
Dharmesh Mehta	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Marketing of Windows Live Messenger.
John Mulgrew	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Licenses to the Microsoft patents in suit.
Tanya Moore	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Licenses to the Microsoft patents in suit.

Name	Address, Telephone No.	Subjects of Likely Discoverable Information.
Julia White	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Marketing, sales, and product management of Exchange and Exchange ActiveSync.
Michael Wilson	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical aspects of Exchange relating to Unified Messaging.
Liangxiao Zhu	One Microsoft Way Redmond, WA 98052 (425) 882-8080	Technical Aspects of Windows Phone 7.

Other individuals not specifically known to Microsoft at this time may possess relevant information, particularly information related to the non-infringement, unenforceability and/or invalidity of the Motorola patents-in-suit and the infringement of the Microsoft patents-in-suit. Such individuals may include, but are not limited to: (a) authors of prior art publications and patents relevant to the subject matter of the Motorola patents-in-suit; (b) individuals having knowledge of any prior art use, sale, offer for sale, or invention relevant to the subject matter of the Motorola patents-in-suit; (c) individuals having knowledge of the level of ordinary skill in the art to which the alleged inventions of the Motorola patents-in-suit pertain; (d) individuals having knowledge of any license to the Motorola patents-in-suit, any offer to license the Motorola patents-in-suit, or any refusal to license the Motorola patents-in-suit; (e) individuals having knowledge of the circumstances or manner in which the alleged inventions are disclosed in the Motorola patents-in-suit; (f) individuals having knowledge of the alleged inventorship, ownership or rights in the Motorola patents-in-suit and/or the subject matter of the Motorola patent-in-suit; (g) individuals affiliated with the law firms involved in the prosecution of the Motorola patents-in-suit; (h) individuals having knowledge of the operation and development of

Microsoft's accused products, and (i) individuals having knowledge of Motorola's infringement of Microsoft's patents-in-suit.

**II. Documents, Data Compilations, or Tangible Things in the Possession, Custody, or Control of Microsoft That Microsoft May Use to Support Its Claims or Defenses.**

Given the information currently known and reasonably available to Microsoft, and without waiving any objections as to any applicable privileges or protections, confidentiality, or the admissibility at trial of any documents identified herein, and expressly reserving the right to rely on additional categories of documents, data compilations, and tangible things and to supplement this initial disclosure as appropriate, Microsoft discloses, without limitation, the following categories (with corresponding locations) of documents, data compilations, and tangible things that are in its possession, custody, or control and may be used to support Microsoft's claims or defenses:

- Documents relating to prior art to the Motorola patents-in-suit (offices of Microsoft's outside counsel in Chicago, Illinois);
- Documents relating to the design and operation of Microsoft's accused products (Redmond, Washington and offices of Microsoft's outside counsel in Chicago, Illinois);
- Documents relating to financial data pertaining to Microsoft's accused products (Redmond, Washington and offices of Microsoft's outside counsel in Chicago, Illinois);
- Publicly available documents related to the prosecution of the Motorola patents-in-suit (offices of Microsoft's outside counsel in Chicago, Illinois);
- Documents relating to the Affirmative Defenses set forth in Defendant Microsoft Corporation's Answer and Counterclaims to Plaintiff's Complaint for Patent Infringement (Redmond, Washington and offices of Microsoft's outside counsel in Chicago, Illinois);
- Documents relating to Microsoft's Counterclaims set forth in Defendant Microsoft Corporation's Answer and Counterclaims to Plaintiff's Complaint for Patent Infringement (Redmond, Washington and offices of Microsoft's outside counsel in Chicago, Illinois);

- Documents relating to the prosecution of the Microsoft patents-in-suit (offices of Microsoft's outside counsel in Chicago, Illinois); and
- Documents relating to infringement and validity of the Microsoft patents-in-suit (offices of Microsoft's outside counsel in Chicago, Illinois).

**III. Computation of Any Category of Damages Claimed by the Disclosing Party.**

Microsoft is entitled to recover damages for Motorola's infringement of the Microsoft patents-in-suit, including pre-judgment and post-judgment interest. Motorola's infringing activities have caused and will continue to cause Microsoft irreparable harm unless the infringement is enjoined by this Court. In addition, Microsoft intends to seek its expenses, costs, attorneys' fees, and any other relief as the Court deems just and proper.

**IV. Any Insurance Agreement Under Which Any Person Carrying On the Business of Insurance May Be Liable To Satisfy Part or All of a Judgment.**

Responsive documents are available for inspection and copying at the Chicago offices of Microsoft's counsel.

DATED this 23<sup>rd</sup> day of June, 2011.

Respectfully submitted,

By: 

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:10-CIV-24063-MORENO

_____	)	
MOTOROLA MOBILITY, INC.,	)	
	)	
Plaintiff,	)	
	)	JURY TRIAL DEMANDED
vs.	)	
	)	
MICROSOFT CORPORATION,	)	
	)	
Defendant.	)	
_____	)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23<sup>rd</sup> day of June, 2011, a true copy of the foregoing document was served upon the following counsel of record in the manner indicated below.

  
\_\_\_\_\_  
Erin E. Kelly

**SERVICE LIST**

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