

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 1:10-CV-24063-MORENO/TORRES

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

MICROSOFT CORPORATION,

Counterclaim Plaintiff,

v.

MOTOROLA MOBILITY, INC.

Counterclaim Defendant.

**PLAINTIFF MOTOROLA MOBILITY, INC.'S
FIRST SET OF INTERROGATORIES (NOS. 1-15)
TO DEFENDANT MICROSOFT CORPORATION**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff-
Counterclaim Defendant Motorola Mobility, Inc. ("Motorola Mobility") requests that Defendant
Counterclaim Plaintiff Microsoft Corporation ("Microsoft") fully answer in writing and under
oath, within thirty (30) days of the service, each of the Interrogatories set forth below.

REDACTED

INTERROGATORY NO. 10:

Separately for each release and/or version of each of the Accused Products, identify in descending order of knowledge the three persons currently or formerly employed by Microsoft who are most knowledgeable about each of the following topics concerning each Accused Product:

- (a) structure, operation, and function;
- (b) design and development;
- (c) source code and object code;
- (d) Application Programming Interfaces and communication protocols, if any;
- (e) testing and deployment;

- (f) marketing, advertising, and promotion;
- (g) any formal or informal training, technical support, and customer feedback;
- (h) offers for sale;
- (i) licensing;
- (j) pricing;
- (k) sales;
- (l) financial reporting;
- (m) business planning and product management;
- (n) competition for licensing or sales of the Accused Products, in the United States; and
- (o) any formal or informal tests, studies, comparisons, analyses, or reports, in any form, involving, referring, or relating to the Accused Products.

RESPONSE TO INTERROGATORY NO. 10:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Microsoft objects to this Interrogatory as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it calls for information not relevant to any claim, defense, or relief at issue in this litigation or seeks information regarding technology, products, or portions of products that are not accused of infringement. Microsoft objects to this Interrogatory as vague and ambiguous, as it is impossible for Microsoft to quantify which three persons “are most knowledgeable” concerning the specified topic(s), or to rank-order their degree of knowledge with regard to such topic(s). Moreover, the specified categories are vague and ambiguous and, to the extent Microsoft understands what is intended, are not necessarily reflective of the internal division of labor or knowledge within the company. Microsoft further objects to this Interrogatory as calling for information that is cumulative or duplicative to the extent it purports to require the identification of three persons most knowledgeable about the information indicated. Microsoft

objects to this Interrogatory to the extent that it constitutes multiple interrogatories and causes Motorola to exceed the number of interrogatories permitted under the Federal Rules. Microsoft further objects to this Interrogatory on the grounds that it calls for a legal conclusion. Microsoft reserves the right to supplement its response to this Interrogatory as discovery continues.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10:

Microsoft incorporates, as though fully set forth herein, its previous objections and responses to Motorola's Interrogatory No. 10. Subject to the foregoing, Microsoft supplements its response as follows: Abolade Gbadegesin may have potentially relevant knowledge concerning technical aspects of Windows Marketplace. Marcus Ash may have potentially relevant knowledge concerning technical aspects of Bing Maps on Windows Phone 7. Ed Hott and Greg Bolles may have potentially relevant knowledge concerning technical aspects of Exchange and Exchange ActiveSync. Adam Czeisler may have potentially relevant knowledge concerning technical aspects of Windows Live Messenger. Amit Gupta may have potentially relevant knowledge concerning technical aspects of Lync. Fil Alleva may have potentially relevant knowledge concerning technical aspects of speech recognition. Michael Wilson may have potentially relevant knowledge concerning technical aspects of Exchange relating to Unified Messaging. Todd Brix may have potentially relevant knowledge concerning marketing, sales and product management of Windows Marketplace. Stephanie Ferguson may have potentially relevant knowledge concerning business planning and product management of Windows Phone 7. Aidan Marcuss may have potentially relevant knowledge concerning marketing, sales and product management of Windows 7. Julia White may have potentially relevant knowledge concerning marketing, sales and product management of Exchange and Exchange ActiveSync. Kirk Gregersen may have potentially relevant knowledge concerning marketing, sales and product

management of Lync and Unified Messaging. Dharmesh Mehta may have potentially relevant knowledge concerning marketing of Windows Live Messenger. Joe Binz may have potentially relevant knowledge concerning financial reporting of Exchange, Exchange ActiveSync, Lync and Unified Messaging. Glen Copping may have potentially relevant knowledge concerning financial reporting of Windows Mobile. Microsoft reserves the right to supplement its response to this Interrogatory as discovery continues.

REDACTED