# Exhibit 2

#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

MIRROR WORLDS, LLC

Plaintiff,

v.

JURY TRIAL DEMANDED

APPLE INC.

Defendant.

APPLE INC.

Counterclaim Plaintiff

v.

MIRROR WORLDS, LLC,

MIRROR WORLDS TECHNOLOGIES, INC.,

Counterclaim Defendants.

**APPLE INC.'S PROPOSED VERDICT FORM** 

In answering these questions, you are to follow all of the instructions I have given you in the Court's Charge.

#### I. INFRINGEMENT OF MIRROR WORLDS' PATENTS

A. Did Mirror Worlds prove by a preponderance of the evidence that Apple directly infringed the listed claims of the '227 Patent by making, using, selling, and/or offering to sell the accused products in the United States?

Answer "Yes" or "No" for each listed claim and product (skip line marked "N/A"):

	Mac OS X 10.4 Running on Apple Computer	Mac OS X 10.5 or 10.6 Running on Apple Computer
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 20		
Claim 22	N/A	

B. Did Mirror Worlds prove by a preponderance of the evidence that Apple directly infringed the listed claims of the '313 Patent by making, using, selling, and/or offering to sell Mac OS X 10.5 or 10.6 running on an Apple computer in the United States?

Answer "Yes" or "No" for each listed claim:

Claim 1	
Claim 2	
Claim 3	
Claim 4	
Claim 9	
Claim 10	
Claim 11	

C. Did Mirror Worlds prove by a preponderance of the evidence that Apple directly infringed the listed claims of the '427 Patent by making, using, selling, and/or offering to sell the accused products in the United States?

Answer "Yes" or "No" for each listed claim and product (skip lines marked "N/A"):

	Mac OS X 10.5 or 10.6 Running on Apple Computer	iPhone, iPod Touch, and iPad	iPod Classic and iPod Nano	iTunes Running on Apple Computer	Safari 4 Running on Apple Computer
Claim 1		N/A	N/A	N/A	N/A
Claim 2		N/A	N/A	N/A	N/A
Claim 5		N/A	N/A	N/A	N/A
Claim 7		N/A	N/A	N/A	N/A
Claim 8		N/A	N/A	N/A	N/A
Claim 9		N/A	N/A	N/A	N/A
Claim 10		N/A	N/A	N/A	N/A

	Mac OS X 10.5 or 10.6 Running on Apple Computer	iPhone, iPod Touch, and iPad	iPod Classic and iPod Nano	iTunes Running on Apple Computer	Safari 4 Running on Apple Computer
Claim 13		N/A	N/A	N/A	N/A
Claim 15		N/A	N/A	N/A	N/A
Claim 16					
Claim 17					
Claim 18					
Claim 19					
Claim 22		N/A	N/A	N/A	N/A
Claim 24		N/A	N/A	N/A	N/A
Claim 25		N/A	N/A	N/A	N/A
Claim 26		N/A	N/A	N/A	N/A
Claim 29		N/A	N/A	N/A	N/A
Claim 31		N/A	N/A	N/A	N/A
Claim 32		N/A	N/A		
Claim 33		N/A	N/A	N/A	N/A
Claim 34		N/A	N/A		
Claim 37		N/A	N/A	N/A	N/A
Claim 39		N/A	N/A	N/A	N/A

D. Did Mirror Worlds prove by a preponderance of the evidence that Apple directly infringed claim 1 of the '999 Patent by making, using, selling, and/or offering to sell (i) any

Apple computer or device containing or utilizing Mac OS X 10.5 or 10.6 or Mac OS X Server
10.5 or 10.6 and (ii) an Apple enterprise server in the United States?
Answer "Yes" or "No"

#### II. INVALIDITY OF MIRROR WORLDS' PATENTS

A. Did Apple prove that the listed claims of the '227 Patent are invalid for any of the following reasons? For invalidity defenses based on prior art that was not considered by the USPTO during the prosecution of the '227 Patent, Apple must have proved invalidity by a preponderance of the evidence. For all other invalidity defenses, Apple must have proved invalidity by clear and convincing evidence.

#### Answer "Yes" or "No" for each listed claim and defense:

	1. Anticipation by Prior Art	2. Obviousness	3. Lack of Adequate Written Description	4. Lack of Enablement
Claim 13				
Claim 14				
Claim 15				
Claim 16				
Claim 17				
Claim 20				
Claim 22				

B. Did Apple prove that the listed claims of the '313 Patent are invalid for any of the following reasons? For invalidity defenses based on prior art that was not considered by the USPTO during the prosecution of the '313 Patent, Apple must have proved invalidity by a preponderance of the evidence. For all other invalidity defenses, Apple must have proved invalidity by clear and convincing evidence.

## Answer "Yes" or "No" for each listed claim and defense:

	1. Anticipation by Prior Art	2. Obviousness	3. Lack of Adequate Written Description	4. Lack of Enablement
Claim 1				
Claim 2				·
Claim 3				
Claim 4				
Claim 9				
Claim 10				
Claim 11				
		<del></del>		<del></del> .

C. Did Apple prove that the listed claims of the '427 Patent are invalid for any of the following reasons? For invalidity defenses based on prior art that was not considered by the USPTO during the prosecution of the '427 Patent, Apple must have proved invalidity by a preponderance of the evidence. For all other invalidity defenses, Apple must have proved invalidity by clear and convincing evidence.

## Answer "Yes" or "No" for each listed claim and defense:

	1. Anticipation	2. Obviousness	3. Lack of	4. Lack of
	by Prior Art		Adequate	Enablement
			Written	
			Description	
Claim 1				
		<del></del>		
Claim 2				
Claim 5				

	1. Anticipation by Prior Art	2. Obviousness	3. Lack of Adequate Written Description	4. Lack of Enablement
Claim 7				
Claim 8				
Claim 9				
Claim 10				
Claim 13				
Claim 15				
Claim 16				
Claim 17				
Claim 18				
Claim 19				
Claim 22				
Claim 24	<del></del>			
Claim 25	<del></del>			
Claim 26				
Claim 29				
Claim 31				
Claim 32				
Claim 33				
Claim 34				
Claim 37				
Claim 39				

D. Did Apple prove that claim 1 of the '999 Patent is invalid for any of the following reasons? For invalidity defenses based on prior art that was not considered by the USPTO during the prosecution of the '999 Patent, Apple must have proved invalidity by a preponderance of the evidence. For all other invalidity defenses, Apple must have proved invalidity by clear and convincing evidence.

#### Answer "Yes" or "No" for each listed defense:

	1.	2.	3. Lack of	4. Lack of	5. Improper
	Anticipation	<b>Obviousness</b>	Adequate	<b>Enablement</b>	Inventorship
	by Prior Art		Written		
			Description		
Claim 1					

## III. UNENFORCEABILITY OF MIRROR WORLDS' PATENTS

A.	Did Apple prove by clear and convincing evidence that the '227 Patent is
unenforceable	for inequitable conduct?
Answer "Yes'	" or "No"
В.	Did Apple prove clear and convincing evidence that the '313 Patent is
unenforceable	for inequitable conduct?
Answer "Yes	" or "No"
C.	Did Apple prove clear and convincing evidence that the '427 Patent is
unenforceable	for inequitable conduct?
Answer "Yes'	" or "No"
D.	Did Apple prove clear and convincing evidence that the '999 patent is
unenforceable	for inequitable conduct?
Answer "Yes'	" or "No"

If you found in Questions I. A through D that Mirror Worlds proved that Apple infringed at least one claim of the Mirror Worlds Patents (a "Yes" answer to any claim) and you found in Questions II. A through D that Apple did not prove that any infringed claim was invalid (a "No" answer to any claim for which you found infringement) and you found in Questions III. A through D that Apple did not prove that any infringed and valid claim was unenforceable (a "No" answer to any claim for which you found infringement and did not find invalidity), then answer Questions IV and V. Otherwise skip to Question VI.

#### IV. WILLFUL INFRINGEMENT OF MIRROR WORLDS' PATENTS

A. Did Mirror Worlds prove by clear and convincing evidence that Apple's infringement of any valid and enforceable claim was willful?

Answer	"Yes"	or	"No"	

## V. DAMAGES FOR INFRINGEMENT OF MIRROR WORLDS' PATENTS

A. What date did you determine damages for infringement of the Mirror Worlds'	
patents should begin?	
Date:	
B. What sum of money, if any, if paid now in cash, do you find should be awarded	d to
Mirror Worlds as damages adequate to compensate it for the valid patent claims you have fou	nd
to have been infringed? Only award damages for those claims you find infringed, valid, and	
enforceable. Do not award damages for claims that you did not find infringed, valid, and	
enforceable.	
Answer:	
C. You have heard testimony regarding a "running royalty," which is a royalty	
determined by the amount of use of the purported invention over time. You have also heard	
testimony regarding a "lump sum paid up royalty," which is a fixed amount paid to the patent	
holder regardless of the amount of use of the purported invention over time. If you have	
awarded reasonable royalty damages above, is that award based on a "running royalty" or a	
"lump sum paid up royalty"?	
Answer:	

#### VI. INFRINGEMENT OF APPLE'S PATENT

A. Did Apple prove by a preponderance of the evidence that Mirror Worlds

Technologies ("MWT") infringed the listed claims of the Apple Patent directly, indirectly,
literally or under the Doctrine of Equivalents?

## Answer "Yes" or "No" for each listed claim:

Claim 1	
Claim 2	
Claim 3	
Claim 4	
Claim 5	
Claim 6	
Claim 7	
Claim 8	
Claim 9	
Claim 10	
Claim 11	
Claim 12	

#### VII. INVALIDITY OF APPLE'S PATENT

A. Did MWT prove that the listed claims of the '101 Patent are invalid for any of the following reasons? For anticipation by prior art that was not considered by the USPTO during the prosecution of the '101 Patent, MWT must have proved invalidity by a preponderance of the evidence. For all other invalidity defenses, MWT must have proved invalidity by clear and convincing evidence.

## Answer "Yes" or "No" for each listed claim and defense:

	1. Anticipation by Prior Art	2. Obviousness
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 10		
Claim 11		
Claim 12		

If you found in Question VI that Apple proved that the Mirror Worlds Parties infringed at least one claim of the Apple Patent (a "Yes" to any claim), and you found in Questions VII that MWT did not prove that any infringed claim was invalid (a "No" to any claim for which you found infringement) then answer Questions VIII and IX. Otherwise you are finished, and the foreperson should sign and date the last page of this Verdict Form.

VIII.	WILLFUL INFRINGEMENT OF APPLE'S PATENT		
	A.	Did Apple prove by clear and convincing evidence that MWT's infringement of	
any va	lid clai	m was willful?	
Answe	er "Yes	" or "No"	
IX.	DAM	AGES FOR INFRINGEMENT OF APPLE'S PATENT	
	A.	What date did you determine damages for infringement of Apple's Patent should	
begin?	•		
Date:			
	B.	What sum of money, if any, if paid now in cash, do you find should be awarded to	
A 1	1		

B. What sum of money, if any, if paid now in cash, do you find should be awarded to Apple as damages adequate to compensate it for the valid patent claims you have found to have been infringed? Only award damages for those claims you find infringed and valid. Do not award damages for claims that you did not find infringed and valid.

Answer:	
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Signed this _	day of September, 2010:
	JURY FOREPERSON