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November 16, 2011

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The Honorable Barbara B. Crabb  
United States District Court for the  
Western District of Wisconsin  
120 North Henry Street, Room 320  
Madison, WI 53703

Re: *Apple Inc., et al. v. Motorola, Inc., et al.*,  
Case No. 3:10-CV-00662-BBC

Dear Judge Crabb:

Defendants Motorola Solutions, Inc. (f/k/a Motorola, Inc.) and Motorola Mobility, Inc. (collectively "Motorola") have reviewed the Court's November 10, 2011 letter regarding the possible transfer of this case to a judge in Chicago. Motorola does not object to this transfer. Motorola, however, has been informed by opposing counsel that Plaintiffs Apple Inc. and NeXT Software, Inc. (collectively "Apple") intend to object.

Motorola is well aware of the challenges that a case of this size and complexity brings to the Court's already substantial docket. As the Court is aware, the parties' opening summary judgment briefs total nearly 400 pages, plus hundreds of supporting exhibits. Given the length and breadth of the arguments presented, Motorola will be filing a motion seeking additional time for the parties to prepare their response and reply briefs. In light of the Court's other cases and commitments, the Court may very well want additional time to fully consider all of the parties' arguments and possibly narrow the issues in advance of trial.

The Honorable Barbara B. Crabb  
November 16, 2011  
Page 2

In this regard, if the case is not transferred, Motorola is amenable to extending the trial date. Motorola wishes to ensure that the Court has sufficient time to consider the parties' motions for summary judgment in advance of trial. Given that Apple moved to stay this case in September (Dkt. Nos. 154-56), Motorola respectfully submits that there can be no cognizable prejudice to Apple in extending the trial date.

Sincerely,

s/ Lynn M. Stathas

Lynn M. Stathas

cc James D. Peterson, Esq.  
Richard W. Erwine, Esq.