

EXHIBIT 20

Exhibit H – U.S. Patent No. 5,969,705

Motorola directly and/or indirectly infringes at claim 1 of the '705 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, Cliq, Cliq XT, Cliq 2, Charm, Defy, Devour, BackFlip, Devour, Droid, Droid 2, Droid 2 Global, Droid X, Droid Pro, Flipout, Flipside, i1 and Xoom (collectively, "the '705 Accused Products").¹

For the purposes of this analysis, Apple will examine a representative mobile device, Motorola's Droid X, which operates with the Android 2.1 Platform. All other '705 Accused Products meet the limitations of the asserted claims on the same bases as indicated for the Droid X, unless otherwise stated.

For the purposes of this analysis, Plaintiffs provide a description of the Google Talk application for the Android operating system, specifically, how running this application allows two processes to send commands, service requests or other information to one another. The description of this specific application is intended to be exemplary only, and not to limit the scope of Plaintiffs' infringement allegations.

In addition to Motorola's direct infringement of claim 1 of the '705 patent through its development, testing, manufacture and use of its devices, Motorola also indirectly infringes claim 1 of the patent. Manufacturers, retailers, distributors, end-users and others in the distribution channel of the '705 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 '705 Accused Products and associated specialized components in the United States, and through the intentional design, marketing, manufacture, sale, and/or technical support of the '705 Accused Products abroad to induce direct infringement in the United States. Motorola supplies '705 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 X User Guide (WI-Apple0034078-34145). Upon information and belief, Motorola has known or should have known that these actions would cause direct infringement of the '705 patent and did so with specific intent to encourage direct infringement. Additionally, the '705 Accused Products have no substantial non-infringing uses

¹ Motorola has announced additional smartphones including XRT and Titanium which may also infringe the '705 Patent. Apple reserves the right to supplement this analysis and this list of accused products as discovery into these newly announced products progresses.

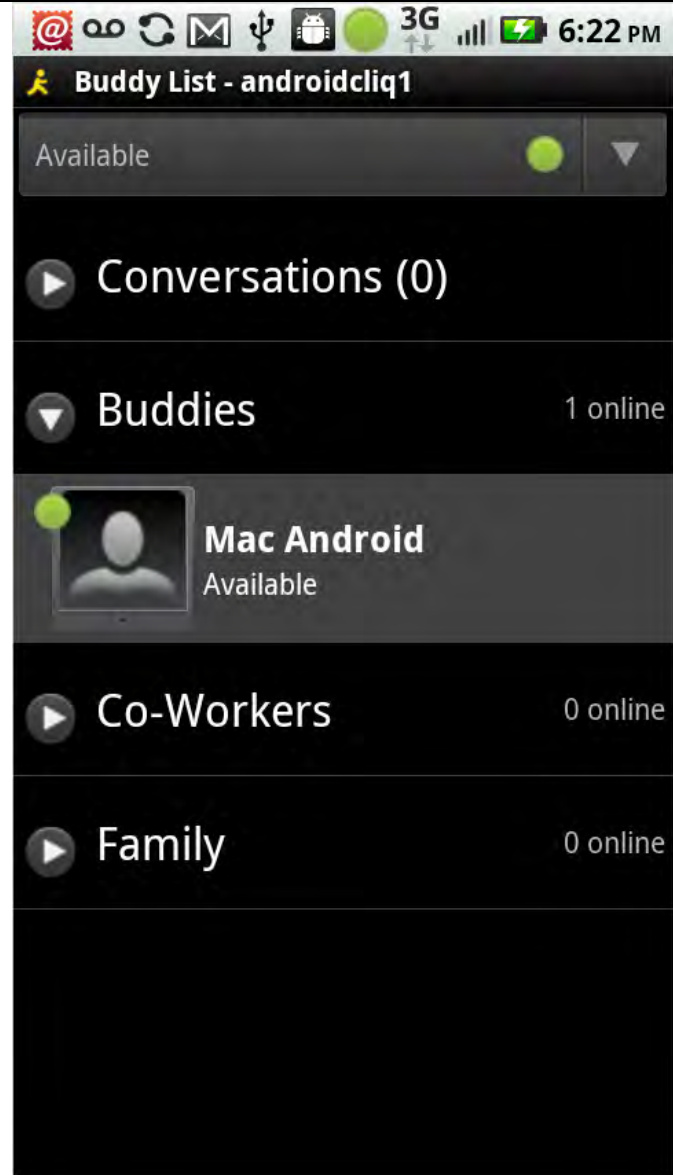
These infringement contentions are preliminary and based only on publicly available information as to the '705 Accused Products. Motorola has not yet provided discovery as to its accused products and in addition Apple's investigation of Motorola's infringement is ongoing. Based on discovery and Apple's 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. Also, these disclosures are made based on information ascertained to date, and Apple expressly reserves the right to modify or amend the disclosures contained herein based on the Court's claim constructions or to reflect additional information that becomes available to Apple.

U.S. Patent No. 5,969,705	Infringement Contentions
<p>1. In a computer system comprising a processor, a display, a memory, a user input device, a first process operative in the computer system, a second process operative in the computer system as a foreground process and a user interface on said computer system display under the control of the second process, a method for the first process to perform operations for the second process and control a content of the user interface on said computer system display, said content under control of the foreground second process operative in said computer system, said first process controlling the content to display information regarding the operations performed by the first process for the second process, said method comprising the following steps:</p>	<p>The '705 Accused Products are computer systems that comprise a processor, a display, a memory, and a user input device. For example, the Motorola Droid X includes a Texas Instruments OMAP3630 Series SoC microprocessor, a 4.3-inch 480 x 854 WVGA resolution display, a memory including 8 GB of Flash memory, as well as 512 MB of RAM, and a touch-sensitive display screen providing a user input device. <i>See Exh. H-1</i> [Droid X Developer Specifications]. Using these components, the Accused Products, on information and belief, perform a method for one process to perform operations for a second process and control a content of the user interface on the computer's display, as set forth herein. <i>See Exh. H-1</i> [Droid X Developer Specifications].</p> <ul style="list-style-type: none"> • By way of example, on information and belief, the Google Talk ("Talk") application on the '705 Accused Products utilizes first and second processes operative in the computer system, where the second process is a foreground process controlling a user interface, with at least some operations performed by a background (first) process which also controls content of the user interface. When initiated, the Talk application initiates a background ('first') process, the GTalk service, to perform operations for the foreground ('second') process. Exh. H-3 [Droid X System Log File - GTalkService]. • In Android, "[a] service is a component that runs in the background to perform long-running operations or to perform work for remote processes. A service does not provide a user interface." Exh. H-2 [Android Developer Site-

U.S. Patent No. 5,969,705	Infringement Contentions
	“Application Fundamentals”].
<p>a. installing an event handling process as part of said second process, said event handling process when said second process is operative in said computer system, servicing events generated by the first process for controlling said user interface display under control of said second process;</p>	<p>On information and belief, the '705 Accused Products perform the step of installing an event handling process as part of a second process for servicing events generated by the first process for controlling the user interface display under the control of the second process.</p> <ul style="list-style-type: none"> • By way of one example, on information and belief when the foreground Talk application (second process) is active, it installs an event handling process as part of itself. Once this event handling process is installed, it is able to receive incoming events from a background process, the GTalk service, including updates as to user statuses of IM contacts. Exh. H-3 [Droid X System Log File - GTalkService]. • On information and belief, events generated by the background (first process) GTalk service are communicated to other parts of the foreground (second process) Talk application’s event handling process to, e.g., update the Chat Box view with a warning text explaining that the contact is no longer available to chat or that said contact’s status has otherwise changed.

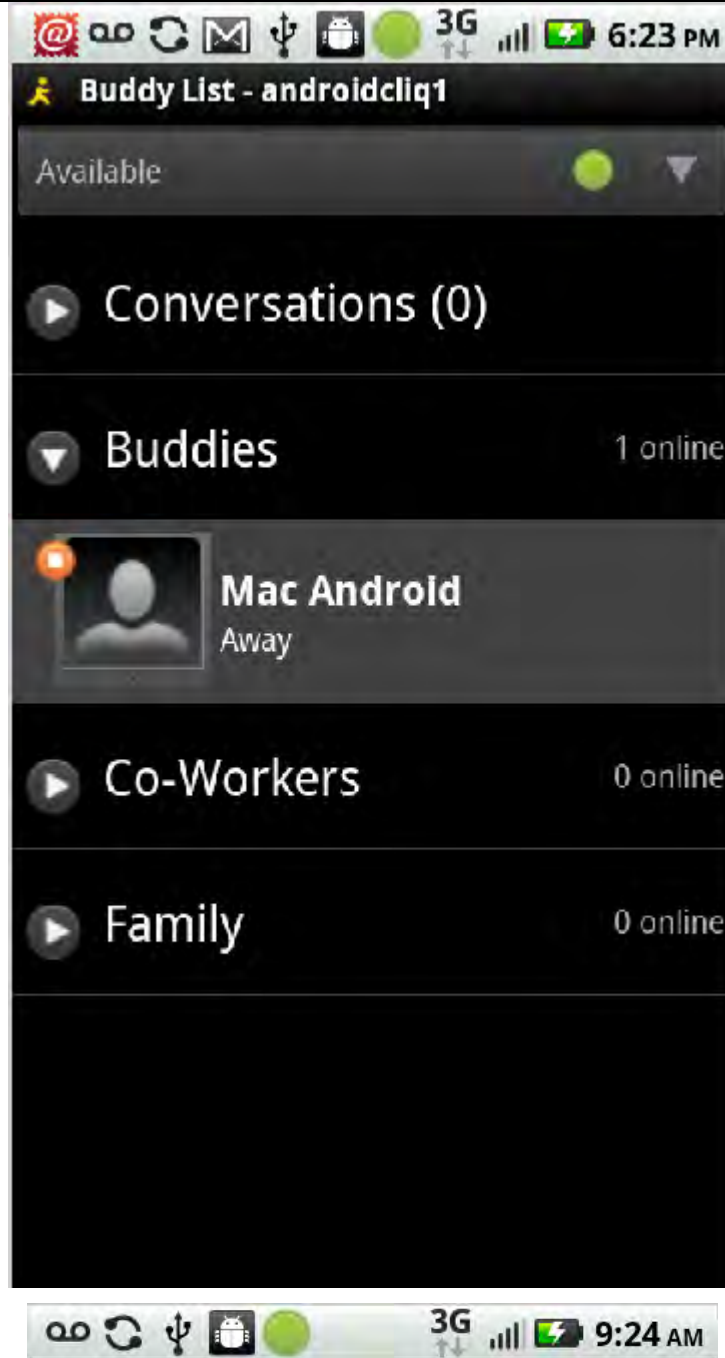
U.S. Patent No. 5,969,705

Infringement Contentions



U.S. Patent No. 5,969,705

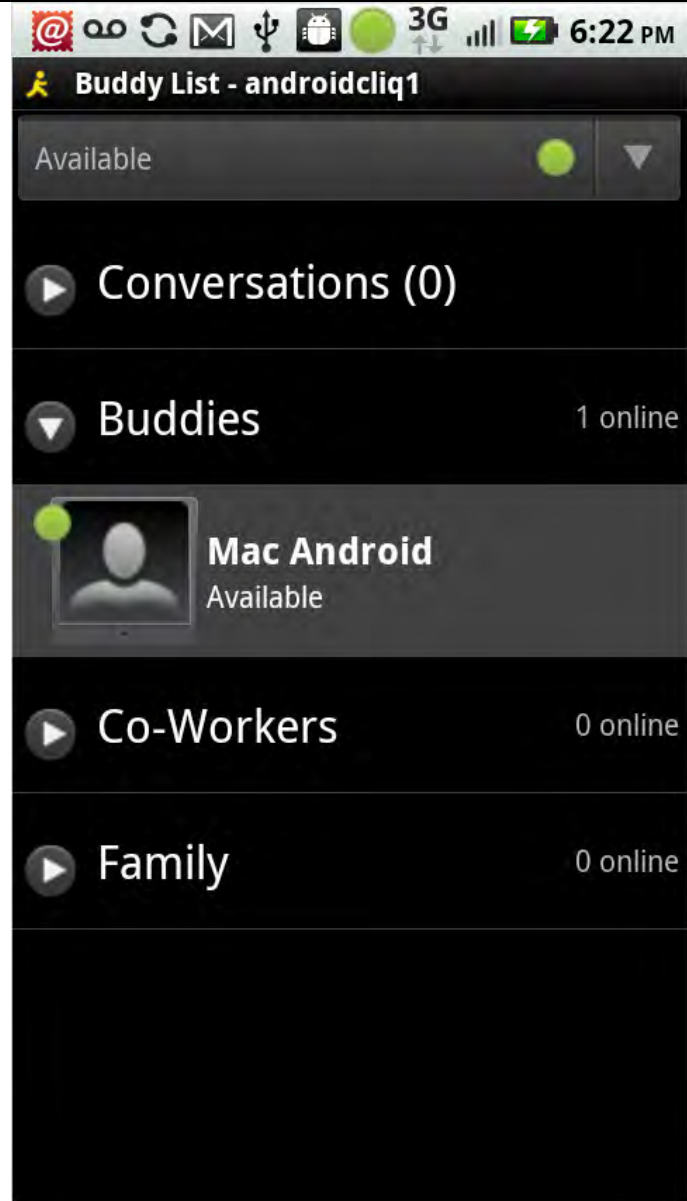
Infringement Contentions



U.S. Patent No. 5,969,705	Infringement Contentions
<p>b. said second process initiating said first process to perform operations for said second process, said second process operative in the foreground and said first process operative in the background;</p>	<p>On information and belief, the '705 Accused Products perform the step of having a second process initiate a first process to perform operations for it, wherein the second process is in the foreground, and the first process in the background.</p> <ul style="list-style-type: none"> • By way of one example, on information and belief, when the Talk application in the '705 Accused Products is initiated, the Talk application (second process) initiates the GTalk service in the background to perform operations for the Talk application, such as maintaining updated information on IM contact statuses. The GTalk service (first process) operates only in the background, as Android services do not have visual user interfaces. Exh. H-2 [Android Developer Site-"Application Fundamentals"]; Exh. H-3 [Droid X System Log File - GTalkService].
<p>d. said first process generating events for controlling said user interface display while the second process remains as a foreground process and the first process is a background process, said events providing information regarding the operations performed by said first process for the second process; and</p>	<p>On information and belief, the '705 Accused Products perform the step of having a first (background) process generate events for controlling a user interface display while a second process remains as a foreground process, and the first process is a background process, wherein said events provide information regarding the operations performed by the first process for the second process.</p> <ul style="list-style-type: none"> • By way of one example, on information and belief, when the Talk application on the '705 Accused Products is initiated, the GTalk service (first process) generates events and sends them to the Talk application (second process), which is in control of the user interface, to reflect the status information about a user's IM contacts. Among other things, the GTalk service (first process) monitors when a contact on a user's buddy list switches their status from "Available" to "Offline."

U.S. Patent No. 5,969,705

Infringement Contentions



U.S. Patent No. 5,969,705

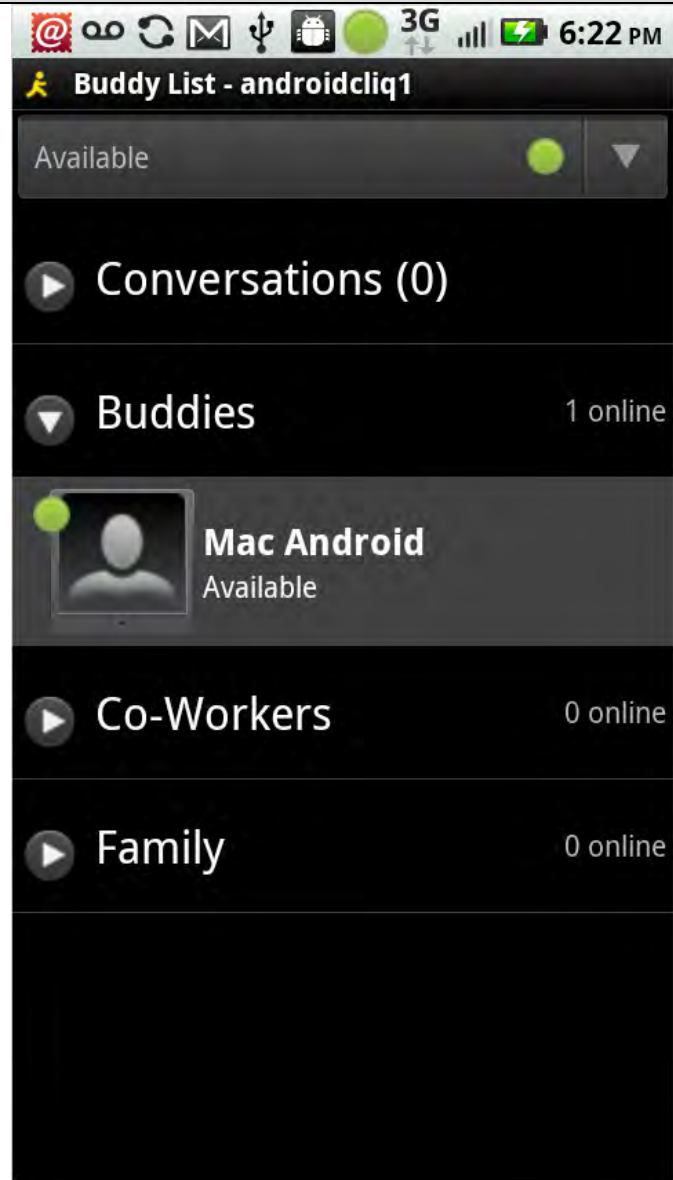
Infringement Contentions



U.S. Patent No. 5,969,705	Infringement Contentions
<p>e. said event handling process receiving events generated by said first process, said event handling process updating said user interface on said computer system display according to said events generated by said first process, while said first process remains in the background, and received by said event handling process.</p>	<p>On information and belief, the '705 Accused Products perform the step of having an event handling process receive events generated by the first process and updating a user interface based on the received events, while the first process remains in the background.</p> <ul style="list-style-type: none"> • By way of one example, on information and belief, the Talk application has a class that handles all events relating to that application. This class includes, among other things, a method which receives the event generated by the GTalk (first) process (such as an event that signals that a contact has logged out and is unavailable to chat) and eventually uses it to update the Talk application's user interface with a warning text explaining that a contact is no longer available to chat. • In Android, “ is a component that runs in the background to perform long-running operations or to perform work for remote processes. A service does not provide a user interface.” Exh. H-2 [Android Developer Site-“Application Fundamentals”].

U.S. Patent No. 5,969,705

Infringement Contentions



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Infringement Contentions

