

EXHIBIT 22

Exhibit O – U.S. Patent No. 5,455,599

Motorola directly and/or indirectly infringes at least claims 15 and 26 of the '599 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, Xoom, (collectively, "the '599 Accused Products").¹

For the purposes of this analysis, Apple will examine a representative mobile device, Motorola's Droid X, which is shipped with the Android 2.1 Platform. All other '599 Accused Products meet the limitations of the asserted claims on the same bases as indicated for the Droid X, unless otherwise stated.

These infringement contentions are preliminary and based only on publicly available information as to the '599 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.

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15. An apparatus for graphic processing, comprising:	The '599 Accused Products are for graphic processing. By way of one example, the Droid X includes the android.graphics package. Exh. O-1 [Android Developers Site-"Package android.graphics"].
(a) a processor,	The '599 Accused Products contain a processor. For example, the Droid X includes a Texas Instruments OMAP3630 Series SoC microprocessor. Exh. O-2 [Droid X Product Specifications].

¹ Motorola has announced additional smartphones including XRT and Titanium which may also infringe the '599 Patent. Apple reserves the right to supplement this analysis and this list of accused products as discovery into these newly announced products progresses.

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(b) a storage attached to and under the control of the processor;	The '599 Accused Products include storage under the control of and attached to the processor. For example, the Droid X includes a memory including 8 GB of Flash memory, as well as 512 MB of RAM. Exh. O-2 [Droid X Product Specifications].
(c) a graphic device attached to and under the control of the processor;	<p>The '599 Accused Products include a graphic device attached to and under the control of the processor.</p> <ul style="list-style-type: none"> • By way of one example, the Droid X includes a 4.3 inch WVGA touch-sensitive display. Exh. O-2 [Droid X Product Specifications]. • By way of another example, as least some of the '599 Accused Products include a graphic accelerator. On information and belief, the OMAP3630 Series SoC microprocessor used in Droid X includes an Imagination Technologies PowerVR SGX530 graphics accelerator.
(d) a modeling layer object in the storage;	<p>The '599 Accused Products include a modeling layer object in the storage.</p> <ul style="list-style-type: none"> • By way of one example, the Droid X utilizes Drawable objects, which contain graphic data and a method for generating a draw call to a Canvas (i.e., grafport) object. Exh. O-7 [Android Developers Site at “public abstract class Drawable”]. • By way of another example, the Droid X utilizes Shape objects, including subclass objects such as PathShape and RectShape, which contain graphic data and a method for generating a draw call to a Canvas (i.e., grafport) object. Exh. O-8 [Android Developers Site-“public abstract class Shape”, “public class PathShape” and “public class RectShape”]. • By way of another example, the Droid X utilizes View objects, which contain graphic data and a method for generating a draw call to a Canvas (i.e., grafport) object. Exh. O-9 [Android Developers Site-“public class View”].

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(e) a grafport object in the storage;	<p>The '599 Accused Products include a grafport object in the storage. For example, the Droid X utilizes Canvas objects which correspond to grafport objects. Exh. O-3 [Android Developers Site-“class Canvas”]. A Canvas object stores graphic state information, such as a transformation matrix, a translation, a rotation, and clipping bounds. <i>Id.</i> Further, a Canvas “works for you as a pretense, or interface, to the actual surface upon which your graphics will be drawn – it holds all of your ‘draw’ calls. Via the Canvas, your drawing is actually performed upon an underlying Bitmap, which is placed into the window.” Exh. O-4 [Android Developers Site-“Graphics”].</p>

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<p>(f) means for generating calls from the modeling layer object to the grafport object using a predefined set of graphic primitives;</p>	<p>The '599 Accused Products include a means for generating calls from the modeling layer object to the grafport object using a predefined set of graphic primitives.</p> <ul style="list-style-type: none"> By way of one example, the implementation of the draw method in the PathShape object includes a call to the method canvas.drawPath(path, paint): <pre data-bbox="835 488 1444 699"> public void draw(Canvas canvas, Paint paint) { canvas.save(); canvas.scale(MScaleX, mScaleY); canvas.drawPath(mPath, paint); canvas.restore(); } </pre> <p>Exh O-13 [PathShape.java].</p> <p>The arguments to this Canvas (i.e., grafport) method include a Path object, which uses a predefined set of graphics primitives. Specifically, the “Path class encapsulates compound (multiple contour) geometric paths consisting of straight line segments, quadratic curves, and cubic curves.” Exh O-14 [Android Developers Site-class “Path”].</p> By way of another example, View objects are user interface objects, such as buttons, that comprise numerous graphic sub-objects. As such, when a View object executes a draw method, its numerous sub-objects will be drawn, each by the execution of a graphic draw primitive, such as methods to draw rectangles, lines, bitmaps, and text. Exh. O-15 [View.java].
<p>(g) means for capturing state information and rendering information at the grafport object; and</p>	<p>The '599 Accused Products include means for capturing state information and rendering information at the grafport object. For example, the Droid X utilizes Canvas (i.e., grafport) objects to capture state information and rendering information. State information captured at the Canvas object includes a transformation matrix, a translation, a rotation, and clipping bounds. Rendering information at the Canvas object includes a bitmap. Exh. O-3 [Android Developers Site-class “Canvas”].</p>

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<p>(h) means for passing the state information and the rendering information to a graphic device object for output on the graphic device.</p>	<p>The '599 Accused Products include means for passing the state and rendering information to a graphic device object for output on the graphic device. For example, the Droid X allows different Canvas objects to be created for output to a display, bitmap, or graphic accelerator (OpenGL). Exh. O-3 [Android Developers Site-class "Canvas"].</p> <p>These different Canvas objects are implemented using internal classes such as SkCanvas and SkGLCanvas. When a Canvas object executes a draw method, it passes state and rendering information to the underlying SkCanvas or SkGLCanvas object. Exh. O-10 [Canvas.cpp, showing implementation of Canvas methods using calls to SkCanvas and SkGLCanvas classes].</p> <p>The SkCanvas and SkGLCanvas classes, in turn, execute draw methods by passing state and rendering information to their corresponding SkDevice and SkGLDevice graphic device objects. Exh. O-11 [SkCanvas.cpp] and Exh. O-11 [SkGLCanvas.cpp].</p> <p>The SkDevice and SkGLDevice classes, in turn, output graphic information to their associated display, bitmap, and graphic accelerator devices. Exhs. O-5 [SkDevice.cpp] and Exh. O-6 [SkGLDevice.cpp].</p>
<p>25. The apparatus as recited in claim 15, wherein an object includes a method and data.</p>	<p>A Shape object includes methods such as draw and resize, and includes data such as canvas, paint, width, and height. Exh. O-8 [Android Developers Site-"public abstract class Shape"].</p>
<p>26. The apparatus as recited in claim 25, wherein the object is polymorphic and extensible.</p>	<p>A Shape object is polymorphic and extensible. Shape is declared as an "abstract" class, i.e., designed to be subclassed, and is thereby extensible. Polymorphic subclasses of Shape include PathShape, RectShape, ArcShape, OvalShape, and RoundRectShape. Exh. O-8 [Android Developers Site-"public abstract class Shape"].</p>