

EXHIBIT 24

Exhibit D – U.S. Patent No. RE 39,486

Motorola directly and/or indirectly infringes at least claim 1 of the RE '486 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: Atrix, Bravo, Cliq, Cliq XT, Cliq 2, Charm, Defy, BackFlip, Devour, Droid, Droid 2, Droid 2 Global, Droid X, Droid Pro, Flipout, Flipside, i1, and Xoom (collectively, "the RE '486 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 RE '486 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 RE '486 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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1. An extensible and replaceable layered component computing arrangement residing on a computer coupled to a computer network, the layered arrangement comprising:	The RE '486 Accused Products include an extensible and replaceable layered component computing arrangement residing on a computer coupled to a computer network. The RE '486 Accused Products are computers. <ul style="list-style-type: none">• For example, the Motorola Droid X includes a Texas Instruments OMAP3630-1000 1GHz processor. See Exh. D-1 [Droid X by Motorola MotoDev Specs] and is capable of executing numerous computer programs such as email programs, web browsers, and instant messaging applications. See Exh. D-2

¹ Motorola has announced additional smartphones including XRT and Titanium which may also infringe the RE'486 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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	<p data-bbox="877 267 1871 297">[Droid X by Motorola Tech Specs]. Accordingly, the Droid X is a computer.</p> <p data-bbox="758 321 1864 418">Moreover, the RE '486 Accused Products are coupled to a computer network. Among other things, the RE '486 Accused Products are coupled to the Internet via cellular and wireless networks. <i>Id.</i></p> <p data-bbox="758 443 1898 511">The RE '486 Accused Products include an extensible and replaceable layered component computing arrangement.</p> <ul data-bbox="835 535 1898 896" style="list-style-type: none"> • For example, Android's application framework enables "reuse and replacement of components." Exh. D-3 [Android Developer Site-"What is Android?"]. A central feature of Android is that one application can make use of elements of other applications (provided those applications permit it). For this to work, the system must be able to start an application process when any part of it is needed, and instantiate the Java objects for that part. Therefore, unlike applications on most other systems, Android applications don't have a single entry point for everything in the application (no main () function, for example). Rather, they have essential components that the system can instantiate and run as needed. Exh. D-4 [Android Developer Site-"Application Fundamentals"]. <p data-bbox="758 920 1856 989">The extensible and replaceable software architecture provided by Android is a layered architecture. <i>See Exh. D-3</i> [Android Developer Site-"What is Android?"].</p> <ul data-bbox="835 1013 1885 1110" style="list-style-type: none"> • For example, Android is composed of multiple layers, such as layers that include applications, application frameworks, core libraries, and the underlying Linux kernel:

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	 <p style="text-align: center;">Exh. D-3 [Android Developer Site-“What is Android?”]</p>
<p>a software component architecture layer interfacing with an operating system to control the operations of the computer, the software component architecture layer defining a plurality of components; and</p>	<p>The RE '486 Accused Products include a software component architecture layer interfacing with an operating system to control the operations of the computer, and defining a plurality of components.</p> <ul style="list-style-type: none"> For example, Android includes low level code that implements the basic Java class structure. This layer, which is implemented by the Dalvik Virtual Machine, interfaces with the operating system to control the operations of the computer. See Exh. D-3 [Android Developer Site-“What is Android?”].
<p>a network component layer for developing network navigation components that provide services directed to the computer network, the network component layer includes application programming</p>	<p>The RE '486 Accused Products include a network component layer for developing network navigation components that provide services directed at a computer network, which layer includes application programming interfaces.</p> <ul style="list-style-type: none"> For example, Android includes Java classes designed to access services directed to the computer network, such as the URLStreamHandler and URLConnection

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<p>interfaces; and</p>	<p>classes, along with the HttpURLConnection, HTTPSURLConnection, and JarURLConnection classes, which are subclasses of the URLConnection class. <i>See</i>, e.g., Exh. D-5 [Android Developer Site-“java.net.URLStreamHandler”], Exh. D-6 [Android Developer Site-“java.net.URLConnection”], Exh. D-7 [Android Developer Site-“java.net.HttpURLConnection”], Exh. D-8 [Android Developer Site-“java.net.JarURLConnection”], and Exh. D-11 [Android Developer Site-“javax.net.ssl,HttpsURLConnection”]. The combination of these classes defines the network component layer. The methods for implementing those classes are in the form of application programming interfaces. <i>See</i> Exh. D-4 [Android Developer Site-“Application Fundamentals”]. The network component layer in Android is designed to be used in developing network navigation components, such as web browsers, email viewers, and similar applications, which provide services directed to the network. <i>See</i> Exh. D-3 [Android Developer Site-“What is Android?”]</p> <p>The RE '486 Accused Products with the Android 2.2 Platform installed include Android Cloud to Device Messaging (“C2DM”). <i>See</i> Exh. D-9 [Android Developer Site-“Android Cloud to Device Messaging”]. “[C2DM] is a service that helps developers send data from servers to their applications on Android devices. The service provides a simple, lightweight mechanism that servers can use to tell mobile applications to contact the server directly, to fetch updated application or user data. The C2DM service handles all aspects of queueing of messages and delivery to the target application running on the target device.” Exh. D-10 [Google Code at “Google Projects for Android: C2DM”].</p> <p>The C2DM framework on the accused devices includes a network component layer enabling software developers to create network navigation components that receive C2DM messages.</p> <ul style="list-style-type: none"> • For example, on information and belief, the C2DM framework includes the com.google.android.c2dm package. <i>Id.</i> <p>Furthermore, the C2DM framework includes application programming interfaces. <i>See</i> Exh. D-9 [Android Developer Site-“Android Cloud to Device Messaging”].</p> <ul style="list-style-type: none"> • For example, it includes a library of classes, such as C2DMessaging, that enable applications to interoperate with the C2DM service. <i>See</i> Exh. D-10 [Google

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	Code at “Google Projects for Android: C2DM”].
<p>a first class included in the application programming interface to construct a first network navigation object that represents different network resources available on the computer network, wherein the network component layer coupled to the software component architecture layer in integrating relation to facilitate communication among the computing and network navigation components.</p>	<p>The RE ’486 Accused Products include a first class included in an application programming interface to construct a first network navigation object that represents different network resources available on the computer network.</p> <ul style="list-style-type: none"> • For example, Android includes a URLConnection class that constructs a first network navigation object. Object instantiations of that class represent different network resources available on the computer network. See Exh. D-6 [Android Developer Site-“java.net.URLConnection”] <p>Moreover, the network component layer is coupled to the software component architecture layer in the RE ’486 Accused Products in integrating relation to facilitate communication among the computing and network navigation components.</p> <ul style="list-style-type: none"> • For example, components within the software component architecture take advantage of the network-directed services provided by network components, thus coupling the software component architecture layer and the network component layer in integrating relation. See Exh. D-4 [Android Developer Site-“Application Fundamentals”]. <p>The RE ’486 Accused Products with the Android 2.2 Platform installed include Android Cloud to Device Messaging (“C2DM”), which includes the application programming interface with a first class to construct a first network navigation object that represents different network resources available on the computer network.</p> <ul style="list-style-type: none"> • For example, the C2DM application programming interface includes the C2DMessaging class, which provides methods to construct objects that represent different network resources available on the computer network. Exh. D-10 [Google Code at “Google Projects for Android: C2DM”]. • For example, the C2DMessaging.register method allows an application such as Google Chrome to Phone to register for the C2DM service. Exh. D-10 [Google Code at “Google Projects for Android: C2DM”]. <p>Moreover, the network component layer and the software component architecture layer for the C2DM are coupled in integrating relation to facilitate communication between the</p>

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	<p>computing and network navigation components.</p> <ul style="list-style-type: none">• For example, software components such as the C2DM Main activity make calls to the C2DMessaging class in order to accomplish such tasks as registering to receive C2DM messages. Exh. D-10 [Google Code at “Google Projects for Android: C2DM”].