

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MOBILEMEDIA IDEAS LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 10-258-SLR

JURY TRIAL DEMANDED

STIPULATION

WHEREAS, the patents now at issue in this action are U.S. Patent Nos. RE 39,231, 6,393,430, and 6,725,155 (collectively, “Patents-in-Suit”);

WHEREAS, Plaintiff MobileMedia Ideas LLC (“MobileMedia”) served a Notice of Rule 30(b)(6) Deposition to Defendant Apple Inc. (“Apple”) dated December 18, 2015 that includes, among others, the following topics: “Knowledge of the Patents-in-Suit and/or any related patents, including the date(s), Persons involved and the circumstances surrounding Apple’s first awareness of any of the Patents-in-Suit and/or Related Patents” (Topic No. 8); “Apple’s knowledge of each Patent-in-Suit” (Topic No. 12); and “The facts and circumstances by which Apple was first notified, first acquired knowledge, or first became aware of each Patent-in-Suit, in any manner and irrespective of whether or not Apple considers such notice, knowledge, or awareness to have any legally binding effect, including the Date(s), Persons involved and the circumstances surrounding Apple’s first notice, knowledge or awareness of any of the Patents-in-Suit and/or related patents” (Topic No. 13) (collectively, “Current Rule 30(b)(6) Deposition Topics”);

WHEREAS, on December 22, 2011, Apple produced a Rule 30(b)(6) witness, Patrick Murphy, who provided Rule 30(b)(6) testimony regarding, among other things, Apple's first knowledge of all patents then at issue in this action, including the Patents-in-Suit;

WHEREAS, the Parties have met and conferred regarding the Current Rule 30(b)(6) Topics and wish to avoid unnecessary time and expense associated with a second deposition on these topics;

It is hereby STIPULATED AND AGREED, by and between the Parties, as follows:

1. Only for purposes of this litigation, Apple stipulates that it first became aware of the Patents-in-Suit when it received the February 19, 2010 letter from Larry Horn on behalf of MobileMedia, produced as MMI-A_00000861, which listed the Patents-in-Suit. Upon receipt, this letter was forwarded to Apple's in-house legal group.

2. Apple denies that such awareness has any legally binding effect.

Dated: January 19, 2016

MORRIS, NICHOLS, ARSHT & TUNNELL
LLP

/s/ Jack B. Blumenfeld

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