


**EXHIBIT B**

**Additional Support for Belief That Relevant Technical Documents Have Not Been Produced**

| Category   | Additional Support   |
|--|--|
| <b>Schematics Not Produced</b>                       | [REDACTED]   |
| <b>Incomplete Schematics</b>                         | [REDACTED]   |
| <b>Documents Describing Cellular Functionalities</b> | <p>[REDACTED]</p> <p>A job listing at Apple for “RF Requirements Engineer” at <a href="https://jobs.apple.com/en-us/details/200082891/rf-requirements-engineer">https://jobs.apple.com/en-us/details/200082891/rf-requirements-engineer</a> confirms that one of the tasks of such an engineer is to “Generate product specific RF Requirements Specifications insuring that functional and performance requirements are fully vetted and consistent with overall product definition and design goals.” Apple has not produced RF Requirements Specifications.</p> |
| <b>Requirements Specifications</b>                   | [REDACTED] ist   |

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|--------------------------|---|
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| <b>Testing Documents</b> | <p>Apple runs a webpage describing tests Apple conducts to test the battery performance of its devices, including tests performed on the CDMA network and streaming videos, features implicated in the '193, '991, and '493 Patents. <i>See</i> <a href="https://www.apple.com/iphone/battery.html">https://www.apple.com/iphone/battery.html</a></p> <p>Publicly available documents confirm the presence of Apple's testing labs where they conduct numerous tests on their devices prior to their release. <i>See</i> <a href="https://www.vox.com/2014/9/25/11631290/inside-apples-secret-testing-labs-where-phones-are-bent-all-day-long">https://www.vox.com/2014/9/25/11631290/inside-apples-secret-testing-labs-where-phones-are-bent-all-day-long</a>; <i>see also</i> <a href="https://www.independent.co.uk/life-style/gadgets-and-tech/features/apple-iphone-privacy-security-park-interview-federighi-a8925291.html">https://www.independent.co.uk/life-style/gadgets-and-tech/features/apple-iphone-privacy-security-park-interview-federighi-a8925291.html</a></p> |