

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MOBILEMEDIA IDEAS LLC,)	
)	
Plaintiff,)	Civil Action No. 3:11-cv-02353-N
)	
v.)	JURY TRIAL DEMANDED
)	
RESEARCH IN MOTION LIMITED and)	
RESEARCH IN MOTION)	
CORPORATION,)	
)	
Defendants.)	

MOBILEMEDIA’S PROPOSED FINAL JURY INSTRUCTIONS

Pursuant to the Court’s Scheduling Order (Dkt. No. 364), Plaintiff MobileMedia Ideas LLC (“MobileMedia”) hereby submits MobilMedia’s Proposed Final Jury Instructions.

November 1, 2013

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2013, the foregoing document was filed electronically in compliance with Local Rule 5.1 and that all counsel of record are being served with a copy of the foregoing instrument via the Court's ECF notification system.

/s/ Mark D. Strachan

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1. GENERAL INSTRUCTIONS

1.1 INTRODUCTION

Members of the jury, now it is time for me to instruct you about the law that you must follow in deciding this case. I will start by explaining your duties and the general rules that apply in every civil case. I will explain some rules that you must use in evaluating particular testimony and evidence. I will explain the positions of the parties and the law you will apply in this case. Last, I will explain the rules that you must follow during your deliberations in the jury room. Please listen very carefully to everything I say.

You will have a written copy of these instructions with you in the jury room for your reference during your deliberations. You will also have a verdict form, which will list the interrogatories, or questions, that you must answer to decide this case.

Source: District of Delaware Model Jury Instructions (Judge Sue Robinson).

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