IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

CORE WIRELESS LICENSING S.A.R.L.	)	
	)	
	)	**CIVIL ACTION NO. 6:12-CV-100**
Plaintiff,	)	
	)	**JURY TRIAL DEMANDED**
v.	)	
	)	
APPLE, INC.,	)	
	)	
Defendant.	)	

CORE WIRELESS LICENSING S.A.R.L'S THIRD AMENDED COMPLAINT
FOR PATENT INFRINGEMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Core Wireless Licensing S.a.r.l. ("Core Wireless"), for its Third Amended Complaint against Defendant, Apple, Inc. ("Apple") alleges:

THE PARTIES

1.   Plaintiff, Core Wireless, is a corporation duly organized and existing under the laws of the Grand Duchy of Luxembourg, having a principal place of business at 16, Avenue Pasteur L-2310 Luxembourg. Core Wireless has a regular and established place of business and does business relating to the patents-in-suit in connection with its wholly-owned subsidiary, Core Wireless Licensing Ltd. ("Core Wireless USA"), a corporation duly organized and existing under the laws of the State of Texas, having a principal place of business at 5700 Granite Parkway, Suite 960, Plano, TX 75024, which is within the Eastern District of Texas. All pertinent documents and discovery relevant to this matter either reside at Core Wireless USA's local address or will be produced at such address.

2.   Defendant, Apple, is a corporation duly organized and existing under the laws of the State of California, having a principal place of business at 1 Infinite Loop, Cupertino, CA 95014. Apple's registered agent, registered with the Texas State Secretary of State's Office, is CT Corp. Systems at 350 N. St. Paul Street, Suite 2900, Dallas, TX 75201.

JURISDICTION

3.   This is an action arising under the patent laws of the United States. Accordingly this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4.   This Court has personal jurisdiction over Apple because Apple has established minimum contacts with the Eastern District of Texas. Apple manufactures (directly or indirectly through third party manufacturers) and/or assembles products that are and have been used, offered for sale, sold, and purchased in the Eastern District of Texas. Apple, directly and/or

through its distribution network, places wireless communication devices within the stream of commerce, which stream is directed at this district, with the knowledge and/or understanding that such products will be sold in the State of Texas. Jurisdiction over Apple in this matter is also proper inasmuch as Apple has voluntarily submitted itself to the jurisdiction of the courts commencing litigations within the State of Texas and by registering with the Texas Secretary of State, a registered agent. Therefore, the exercise of jurisdiction over Apple is appropriate under the applicable jurisdictional statutes and would not offend traditional notions of fair play and substantial justice.

VENUE

5.   Venue is proper in this judicial district pursuant to 28 U.S.C. §§1391(b), (c), (d) and 1400(b) because Apple has committed, and continues to commit, acts of infringement, including providing electronic products that are used, offered for sale, sold, and have been purchased in the State of Texas, including the Eastern District of Texas.

FACTUAL ALLEGATIONS

6.   United States Patent No. 6,792,277 ("the '277 patent"), entitled *Arranging Control Signallings In Telecommunications System*, was duly and lawfully issued September 14, 2004. Core Wireless is the current owner of all rights, title, and interest in the '277 patent. A true and correct copy of the '277 patent is attached hereto as Exhibit 1.

7.   United States Patent No. 6,697,347 ("the '347 patent"), entitled *Method And Apparatus For Controlling Transmission Of Packets In A Wireless Communication System*, was duly and lawfully issued February 24, 2004. Core Wireless is the current owner of all rights, title, and interest in the '347 patent. A true and correct copy of the '347 patent is attached hereto as Exhibit 2.

8.   United States Patent No. 7,447,181 ("the '181 patent"), entitled *Method And Apparatus For Improving A Mobile Station Cell Change Operation In The General Packet Radio System (GPRS)*, was duly and lawfully issued November 4, 2008. Core Wireless is the current owner of all rights, title, and interest in the '181 patent. A true and correct copy of the '181 patent is attached hereto as Exhibit 3.

9.   United States Patent No. 6,788,959 ("the '959 patent"), entitled *Method And Apparatus For Transmitting And Receiving Dynamic Configuration Parameters In A Third Generation Cellular Telephone Network*, was duly and lawfully issued September 7, 2004. Core Wireless is the current owner of all rights, title, and interest in the '959 patent. A true and correct copy of the '959 patent is attached hereto as Exhibit 4.

10.   United States Patent No. 7,529,271 ("the '271 patent"), entitled *Method And System For Controlling Data Transmission With Connection States*, was duly and lawfully issued May 5, 2009. Core Wireless is the current owner of all rights, title, and interest in the '271 patent. A true and correct copy of the '271 patent is attached hereto as Exhibit 5.

11.   United States Patent No. 6,266,321 ("the '321 patent"), entitled *Method For Transmitting Two Parallel Channels Using Code Division And An Apparatus Realizing The Method*, was duly and lawfully issued July 24, 2001. Core Wireless is the current owner of all rights, title, and interest in the '321 patent. A true and correct copy of the '321 patent is attached hereto as Exhibit 6.

12.   United States Patent No. 6,978,143 ("the '143 patent"), entitled *Method And Arrangement For Managing Packet Data Transfer In A Cellular System*, was duly and lawfully issued December 20, 2005. Core Wireless is the current owner of all rights, title, and interest in the '143 patent. A true and correct copy of the '143 patent is attached hereto as Exhibit 7.

13.   United States Patent No. 7,804,850 ("the '850 patent"), entitled *Slow Mac-E For Autonomous Transmission In High Speed Uplink Packet Access (HSUPA) Along With Service Specific Transmission Time Control,* was duly and lawfully issued September 28, 2010. Core Wireless is the current owner of all rights, title, and interest in the '850 patent. A true and correct copy of the '850 patent is attached hereto as Exhibit 8.

14.   United States Patent No. 7,817,679 ("the '679 patent"), entitled *Method And A System For Transferring AMR Signaling Frames On Halfrate Channels,* was duly and lawfully issued October 19, 2010. Core Wireless is the current owner of all rights, title, and interest in the '679 patent. A true and correct copy of the '679 patent is attached hereto as Exhibit 9.

15.   United States Patent No. 7,415,045 ("the '045 patent"), entitled *Method And A System For Transferring AMR Signaling Frames On Halfrate Channels,* was duly and lawfully issued August 19, 2008. Core Wireless is the current owner of all rights, title, and interest in the '045 patent. A true and correct copy of the '045 patent is attached hereto as Exhibit 10.

16.   United States Patent No. 6,674,860 ("the '860 patent"), entitled *Method And Arrangement For Managing A Service In A Mobile Communications System,* was duly and lawfully issued January 6, 2004. Core Wireless is the current owner of all rights, title, and interest in the '860 patent. A true and correct copy of the '860 patent is attached hereto as Exhibit 11.

17.   United States Patent No. 7,383,022 ("the '022 patent"), entitled *Mobile Equipment Based Filtering For Packet Radio Service,* was duly and lawfully issued June 3, 2008. Core Wireless is the current owner of all rights, title, and interest in the '022 patent. A true and correct copy of the '022 patent is attached hereto as Exhibit 12.

18.   United States Patent No. 7,599,664 ("the '664 patent"), entitled *Mobile*

Equipment Based Filtering For Packet Radio Service (PRS), was duly and lawfully issued

October 6, 2009. Core Wireless is the current owner of all rights, title, and interest in the '664

patent. A true and correct copy of the '664 patent is attached hereto as Exhibit 13.

19.   United States Patent No. 8,259,689 ("the '689 patent"), entitled *Method And*

Apparatus For Improving A Mobile Station Cell Change Operation In The General Packet Radio

System (GPRS)), was duly and lawfully issued September 4, 2012. Core Wireless is the current

owner of all rights, title, and interest in the '689 patent. A true and correct copy of the '689

patent is attached hereto as Exhibit 14.

FIRST COUNT

(Infringement of the '277 patent)

20.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-19 of

this Complaint as though fully set forth herein.

21.   Apple has infringed and is infringing the '277 patent by making, using, offering to

sell, and/or selling in the United States, and/or importing into the United States, without

authority, products and services including wireless communication devices including but not

limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with

Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple

iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the '277 patent.

22.   Apple has induced infringement and/or contributed to the infringement, and is

inducing infringement and/or contributing to the infringement of the '277 Patent by making,

using, offering to sell, and/or selling in the United States, and/or importing into the United

States, without authority, products and services including wireless communication devices

including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation),

Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple

iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the

'277 patent, including selling the products and services to customers. Apple's customers who

purchase products and services thereof and operate such products and services thereof in

accordance with Apple's instructions directly infringe one or more claims of the '277 patent.

23.   Apple's infringing activities have been and continue to be willful.

24.   Upon information and belief, at least as early as June 14, 2011, upon settlement of

all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June

14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '277 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing

activities.

25.   Products made and sold in accordance with the following standards infringe one

or more claims of the '277 patent:

     a.   3GPP Standard TS 23.060 V6.7.0;

     b.   3GPP Standard TS 23.221 V6.3.0.

     c.   3GPP Standard TS 24.008 V6.7.0.

26.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.7.0.

27.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.221 V6.3.0.

28.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 24.008 V6.7.0.

29.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

30.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

31.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

32.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

33.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

34.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

35.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

36.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

37.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

38.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

39.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

40.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

41.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

42.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

43.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

44.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

45.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

46.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

47.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

48.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

49.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

50.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

51.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

52.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

53.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

54.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

55.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

56.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

57.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0.

58.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.221 V6.3.0.

59.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0.

60.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

61.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

62.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

63.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

64.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

65.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

66.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

67.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

68.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

69.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

70.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

71.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

72.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

73.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

74.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

75.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

76.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

77.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

78.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal
and periodic routing area updating procedure initiation."

79.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined
routing area updating procedure initiation."

80.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service
Request procedure (Iu mode only)."

81.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service
accept."

82.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service
request."

83.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach
request."

84.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2
product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area
update request."

85.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

86.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

87.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

88.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0.

89.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.221 V6.3.0.

90.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0.

91.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

92.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

93.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

94.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

95.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

96.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

97.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

98.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

99.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

100.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

101.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

102.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

103.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

104.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

105.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

106.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

107.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

108.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

109.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

110.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

111.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

112.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

113.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

114.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

115.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

116.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

117.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

118.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

119.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0.

120.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.221 V6.3.0.

121.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0.

122.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

123.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

124.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

125.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

126.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

127.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

128.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

129.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

130.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

131.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

132.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

133.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

134.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

135.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

136.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

137.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

138.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

139.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

140.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

141.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

142.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

143.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

144.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

145.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

146.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

147.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

148.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

149.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

150.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0.

151.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.221 V6.3.0.

152.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0.

153.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

154.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

155.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

156.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

157.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

158.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

159.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

160.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

161.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

162.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

163.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

164.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

165.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

166.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

167.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

168.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

169.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

170.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

171.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

172.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

173.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

174.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

175.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

176.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

177.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

178.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

179.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

180.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

181.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0.

182.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.221 V6.3.0.

183.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0.

184.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

185.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

186.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

187.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

188.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

189.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

190.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

191.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

192.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

193.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

194.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

195.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

196.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

197.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

198.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

199.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

200.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

201.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

202.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

203.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

204.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

205.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

206.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

207.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

208.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

209.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

210.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

211.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

212.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0.

213. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.221 V6.3.0.

214. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0.

215. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

216. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

217. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

218. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

219. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

220. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

221.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location

management and mobility management concept overview."

222.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM

functionality in different UE service states."

223.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area

update."

224.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

225.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

226.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM

connection establishment initiated by the mobile station."

227.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of

associated RR connection."

228.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach

procedure for GPRS services."

229.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

230.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

231.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

232.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

233.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

234.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

235.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

236.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

237.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

238.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

239.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

240.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

241.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

242.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

243.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0.

244.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.221 V6.3.0.

245.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0.

246.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

247.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

248.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

249.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

250.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

251.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

252.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

253.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

254.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

255.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

256.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

257.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

258.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

259.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

260.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

261.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

262.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

263.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

264.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

265.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

266.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

267.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

268.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

269.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

270.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

271.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

272.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

273.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

274.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0.

275.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.221 V6.3.0.

276.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0.

277.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

278.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

279.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

280.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

281.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

282.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

283.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

284.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

285.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

286.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

287.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

288.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

289.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

290.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

291.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

292.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

293.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

294.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

295.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

296.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

297.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

298.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

299.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

300.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

301.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

302.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

303.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

304.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

305.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0.

306.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.221 V6.3.0.

307.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0.

308.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 5.4.0 titled "General."

309.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.5.3 titled "Combined GPRS / IMSI Attach procedure."

310.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2 titled "Location Management Procedures (Iu-mode)."

311.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.9.2.1 titled "Routeing Area Update Procedure."

312.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.1.2 titled "A/Gb mode to Iu mode Intra-SGSN Change."

313.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.7.0, Section 6.13.2.2 titled "A/Gb mode to Iu mode Inter-SGSN Change."

314.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.2 titled "Location management and mobility management concept overview."

315.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.6 titled "MM functionality in different UE service states."

316.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.221 V6.3.0, Section 6.9.2 titled "Location area update."

317.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 2.2.2 titled "Vocabulary."

318.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.1 titled "General."

319.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.1.1 titled "MM connection establishment initiated by the mobile station."

320.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.5.3.1 titled "Release of associated RR connection."

321.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1 titled "GPRS attach procedure for GPRS services."

322.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.1 titled "GPRS attach procedure initiation."

323.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.1.3 titled "GPRS attach accepted by the network."

324.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.3.2.1 titled "Combined GPRS attach procedure initiation."

325.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5 titled "Routing area updating procedure."

326.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.1.1 titled "Normal and periodic routing area updating procedure initiation."

327.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.5.2.1 titled "Combined routing area updating procedure initiation."

328.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 4.7.13 titled "Service Request procedure (Iu mode only)."

329.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.5 titled "CM service accept."

330.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.2.9 titled "CM service request."

331.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.1 titled "Attach request."

332.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 9.4.14 titled "Routing area update request."

333.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled "CM service type."

334.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.18 titled "Update type."

335.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 24.008 V6.7.0, Section 10.5.5.2 titled "Attach type."

336.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '277 patent.

337.   Upon information and belief, Apple's infringement of the '277 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

338.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

SECOND COUNT

(Infringement of the '347 patent)

339.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-338 of this Complaint as though fully set forth herein.

340.   Apple has infringed and is infringing the '347 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the '347 patent.

341.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '347 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the '347 patent, including selling the products and services to customers. Apple's customers who

purchase products and services thereof and operate such products and services thereof in

accordance with Apple's instructions directly infringe one or more claims of the '347 patent.

342. Apple's infringing activities have been and continue to be willful.

343. Upon information and belief, at least as early as June 14, 2011, upon settlement of

all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June

14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '347 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing

activities.

344. Products made and sold in accordance with the following standards infringe one

or more claims of the '347 patent:

    a. 3GPP Standard TS 25.201 V5.0.0;

    b. 3GPP Standard TS 25.211 V5.1.0;

    c. 3GPP Standard TS 25.214 V5.5.0;

    d. 3GPP Standard TS 25.308 V5.3.0.

345. Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 25.201 V5.0.0.

346. Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 25.211 V5.1.0.

347. Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 25.214 V5.5.0.

348. Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 25.308 V5.3.0.

349.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

350.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

351.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

352.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

353.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

354.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

355.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

356.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

357.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

358.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

359.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

360.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

361.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.201 V5.0.0.

362.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V5.1.0.

363.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.214 V5.5.0.

364.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0.

365.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

366.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

367.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

368.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

369.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

370.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

371.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

372.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

373.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

374.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

375.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

376.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

377.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.201 V5.0.0.

378.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V5.1.0.

379.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.214 V5.5.0.

380.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0.

381.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

382.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

383.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

384.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

385.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

386.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

387.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

388.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

389.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

390.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

391.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

392.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

393.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.201 V5.0.0.

394.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V5.1.0.

395.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.214 V5.5.0.

396.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0.

397.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

398.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

399.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

400.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

401.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

402.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

403.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

404.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

405.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

406.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

407.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

408.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

409.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.201 V5.0.0.

410.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V5.1.0.

411.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.214 V5.5.0.

412.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0.

413.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

414.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

415.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

416.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

417.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

418.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

419.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

420.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

421.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

422.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

423.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

424.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

425.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.201 V5.0.0.

426.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V5.1.0.

427.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.214 V5.5.0.

428.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0.

429.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

430.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

431.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

432.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

433.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

434.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

435.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

436.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

437.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

438.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

439.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

440.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

441.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.201 V5.0.0.

442.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V5.1.0.

443.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.214 V5.5.0.

444.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0.

445.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

446.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

447.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

448.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

449.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

450.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

451.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

452.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

453.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

454.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

455.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

456.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

457.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.201 V5.0.0.

458.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V5.1.0.

459.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.214 V5.5.0.

460.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0.

461.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

462.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

463.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

464.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

465.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

466.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

467.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

468.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

469.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

470.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

471.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

472.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

473.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.201 V5.0.0.

474.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V5.1.0.

475.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.214 V5.5.0.

476.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0.

477.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.201 V5.0.0 , Section 4.1.2 titled "Service provided to higher layers."

478.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

479.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

480.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

481.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

482.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

483.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

484.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

485.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

486.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport channel attributes."

487.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared control channel signaling."

488.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE identification."

489.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.201 V5.0.0.

490.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V5.1.0.

491.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.214 V5.5.0.

492.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V5.3.0.

493.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.201 V5.0.0, Section 4.1.2 titled "Service provided to higher layers."

494.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.12 titled "Shared Control Channel (HS-SCCH)."

495.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 5.3.3.13 titled "High Speed Physical Downlink Shared Channel (HS-PDSCH)."

496.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V5.1.0, Section 7.8 titled "HS-SCCH/HS-PDSCH timing."

497.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.214 V5.5.0, Section 6A.1.1 titled "UE procedure for receiving HS-DSCH."

498.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 1 titled "Scope."

499.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.1 titled "Definitions."

500.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 3.2 titled "Abbreviations."

501.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.2.2.1 titled "FDD Downlink Physical layer Model."

502.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 5.3 titled "Transport

channel attributes."

503.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 7.1.2.1 titled "Shared

control channel signaling."

504.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.308 V5.3.0, Section 8.1.1 titled "UE

identification."

505.   Upon information and belief, Apple will continue to directly infringe, induce

infringement and/or contribute to the infringement of the '347 patent.

506.   Upon information and belief, Apple's infringement of the '347 patent is willful

entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs

incurred in prosecuting this action under 35 U.S.C. § 285.

507.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is

entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful

acts in an amount subject to proof at trial.

THIRD COUNT

(Infringement of the '181 patent)

508.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-507 of

this Complaint as though fully set forth herein.

509.   Apple has infringed and is infringing the '181 patent by making, using, offering to

sell, and/or selling in the United States, and/or importing into the United States, without

authority, products and services including wireless communication devices including but not

limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '181 patent.

510.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '181 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '181 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '181 patent.

511.   Apple's infringing activities have been and continue to be willful.

512.   Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '181 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

513.   Products made and sold in accordance with the following standards infringe one or more claims of the '181 patent:

    a.   3GPP Standard TS 23.060 V6.4.0;

    b.   3GPP Standard TS 44.060 V6.6.0;

    c.   3GPP Standard TS 44.064 V6.0.0.

514.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standards TS 23.060 V6.4.0.

515.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0.

516.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0.

517.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

518.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

519.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

520.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

521.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

522.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the

packet access procedure."

523.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence

control on PRACH."

524.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

525.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

526.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of

upper layer PDUs into RLC data units."

527.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

528.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standards TS 23.060 V6.4.0.

529.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 44.060 V6.6.0.

530.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 44.064 V6.0.0.

531.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

532.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

533.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

534.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

535.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

536.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

537.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

538.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

539.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC

buffer."

540.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation

of upper layer PDUs into RLC data units."

541.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL

command."

542.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standards TS 23.060 V6.4.0.

543.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0.

544.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0.

545.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1

titled "Cell Update Procedure."

546.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

547.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

548.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

549.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

550.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

551.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

552.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

553.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

554.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

555.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

556.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standards TS 23.060 V6.4.0.

557.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0.

558.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0.

559.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

560.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

561.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

562.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

563.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

564.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

565.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

566.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

567.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

568.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

569.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

570.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standards TS 23.060 V6.4.0.

571.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0.

572.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0.

573.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

574.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

575.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

576.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

577.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

578.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

579.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

580.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

581.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

582.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

583.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

584.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standards TS 23.060 V6.4.0.

585.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0.

586.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0.

587.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

588.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

589.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

590.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

591. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

592. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

593. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

594. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

595. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

596. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

597. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

598. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standards TS 23.060 V6.4.0.

599.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0.

600.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0.

601.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

602.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

603.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

604.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

605.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

606.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

607.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

608.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

609.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

610.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

611.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

612.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standards TS 23.060 V6.4.0.

613.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0.

614.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0.

615.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

616.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

617.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

618.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

619.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

620.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

621.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

622.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

623.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

624.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

625.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

626.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standards TS 23.060 V6.4.0.

627.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0.

628.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0.

629.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

630.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview

of radio interface."

631.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary

Block Flow."

632.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell

reselection."

633.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF

establishment initiated by the mobile station on PCCCH."

634.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of

the packet access procedure."

635.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access

persistence control on PRACH."

636.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

637.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

638.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

639.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

640.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standards TS 23.060 V6.4.0.

641.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0.

642.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V6.0.0.

643.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

644.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

645.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary

Block Flow."

646.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell

reselection."

647.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF

establishment initiated by the mobile station on PCCCH."

648.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of

the packet access procedure."

649.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access

persistence control on PRACH."

650.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

651.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC

buffer."

652.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

653.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

654.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standards TS 23.060 V6.4.0.

655.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0.

656.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0.

657.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

658.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

659.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

660.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

661.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

662.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

663.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

664.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

665.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

666.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

667.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL

command."

668.   Upon information and belief, Apple will continue to directly infringe, induce

infringement and/or contribute to the infringement of the '181 patent.

669.   Upon information and belief, Apple's infringement of the '181 patent is willful

entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs

incurred in prosecuting this action under 35 U.S.C. § 285.

670.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is

entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful

acts in an amount subject to proof at trial.

FOURTH COUNT

(Infringement of the '959 patent)

671.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-670 of

this Complaint as though fully set forth herein.

672.   Apple has infringed and is infringing the '959 patent by making, using, offering to

sell, and/or selling in the United States, and/or importing into the United States, without

authority, products and services including wireless communication devices including but not

limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with

Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple

iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the '959 patent.

673.   Apple has induced infringement and/or contributed to the infringement, and is

inducing infringement and/or contributing to the infringement of the '959 Patent by making,

using, offering to sell, and/or selling in the United States, and/or importing into the United

States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the '959 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '959 patent.

674.   Apple's infringing activities have been and continue to be willful.

675.   Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '959 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

676.   Products made and sold in accordance with the following standards infringe one or more claims of the '959 patent:

      a. 3GPP Standard TS 25.201 V5.3.0;

      b. 3GPP Standard TS 25.302 V4.1.0;

      c. 3GPP Standard TS 25.321 V4.1.0;

      d. 3GPP Standard TS 25.322 V4.1.0;

      e. 3GPP Standard TS 25.331 V4.0.0;

      f. 3GPP Standard TS 25.331 V4.1.0;

      g. 3GPP Standard TS 44.018 V4.4.0;

      h. 3GPP Standard TS 45.002 V4.3.0;

i. 3GPP Standard TS 45.008 V4.3.0;

j. 3GPP Standard TR 21.905 V10.3.0.

677.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.201 V5.3.0.

678.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.302 V4.1.0.

679.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.321 V4.1.0.

680.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.322 V4.1.0.

681.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0.

682.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.1.0.

683.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.018 V4.4.0.

684.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.002 V4.3.0.

685.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0.

686.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TR 21.905 V10.3.0.

687.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

688.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

689.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

690.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

691.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

692.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

693.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

694.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

695. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

696. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

697. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

698. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

699. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

700. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

701. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

702. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

703.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

704.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

705.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

706.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

707.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

708.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

709.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

710.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

711.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

712.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

713.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

714.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

715.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

716.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

717.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

718.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

719.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

720.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

721.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

722.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.201 V5.3.0.

723.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.302 V4.1.0.

724.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.321 V4.1.0.

725.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.322 V4.1.0.

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730.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0.

731.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TR 21.905 V10.3.0.

732.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

733.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

734.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

735.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

736.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

737.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

738.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

739.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

740.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

741.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

742.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

743.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

744.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

745.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

746.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

747.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

748.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

749.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

750.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

751.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

752.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

753.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

754.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

755.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

756.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

757.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

758.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

759.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

760.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

761.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

762.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

763.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

764.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

765.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

766.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

767.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.201 V5.3.0.

768.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.302 V4.1.0.

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773.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.018 V4.4.0.

774.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.002 V4.3.0.

775.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0.

776.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TR 21.905 V10.3.0.

777.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

778.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

779.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

780.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

781.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

782.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

783.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

784.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

785.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

786.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

787.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

788.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

789.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

790.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

791.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

792.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

793.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

794.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

795.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

796.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

797.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

798.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

799.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

800.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

801.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

802.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

803.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

804.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

805.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

806.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

807.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

808.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

809.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

810.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

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812.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.201 V5.3.0.

813.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.302 V4.1.0.

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820.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0.

821.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TR 21.905 V10.3.0.

822.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

823.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

824.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

825.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

826.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

827.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

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830.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

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833.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

834.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

835.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

836.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

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838.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

839.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

840.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

841.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

842.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

843.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

844.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

845.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

846.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

847.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

848.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

849.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

850.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

851.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

852.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

853.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

854.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

855.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

856.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

857.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.201 V5.3.0.

858.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.302 V4.1.0.

859.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V4.1.0.

860.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.322 V4.1.0.

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863.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.018 V4.4.0.

864.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.002 V4.3.0.

865.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0.

866.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TR 21.905 V10.3.0.

867.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

868.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

869.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

870.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

871.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

872.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

873.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

874.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

875.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

876.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

877.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

878.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

879.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

880.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

881.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

882.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

883.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

884.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

885.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

886.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

887.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

888.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

889.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

890.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

891.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

892.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

893.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

894.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

895.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

896.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

897.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

898.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

899.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

900.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

901.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

902.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.201 V5.3.0.

903.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.302 V4.1.0.

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910.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0.

911.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TR 21.905 V10.3.0.

912.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

913.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

914.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

915.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

916.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

917.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

918.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

919.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

920.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

921.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

922.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

923.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

924.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

925.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

926.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

927.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

928.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

929.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

930.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

931.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

932.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

933.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

934.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

935.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

936.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

937.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

938.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

939.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

940.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

941.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

942.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

943.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

944.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

945.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

946.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

947.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.201 V5.3.0.

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957. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

958. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

959.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

960.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

961.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

962.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

963.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

964.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

965.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

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967.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

968.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

969.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

970.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

971.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

972.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

973.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

974.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

975.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

976.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

977.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

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980.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

981.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

982.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

983.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

984.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

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988.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

989.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

990.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

991.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

992.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.201 V5.3.0.

993.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.302 V4.1.0.

994.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.321 V4.1.0.

995.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.322 V4.1.0.

996.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0.

997.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.1.0.

998.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.018 V4.4.0.

999.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.002 V4.3.0.

1000.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.008 V4.3.0.

1001.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TR 21.905 V10.3.0.

1002.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

1003.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

1004.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

1005.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

1006.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

1007.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

1008.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

1009.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

1010.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

1011.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

1012.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

1013.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

1014.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

1015.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

1016.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

1017.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

1018.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

1019.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

1020.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

1021.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

1022.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

1023.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

1024.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

1025.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

1026.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station

side."

1027.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast

control channel (BCCH)."

1028.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

1029.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall

process."

1030.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS

measurement procedure."

1031.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

1032.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements

for Cell Reselection."

1033.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

1034.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

1035.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

1036.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

1037.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.201 V5.3.0.

1038.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.302 V4.1.0.

1039.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.321 V4.1.0.

1040.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.322 V4.1.0.

1041.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0.

1042.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.1.0.

1043.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.018 V4.4.0.

1044.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 45.002 V4.3.0.

1045.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 45.008 V4.3.0.

1046.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TR 21.905 V10.3.0.

1047.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General

Protocol Architecture."

1048.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service

provided to higher layers."

1049.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1

functions."

1050.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions

with L2 retransmission functionality."

1051.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of

unknown, unforeseen and erroneous protocol data."

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1052. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

1053. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

1054. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

1055. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

1056. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

1057. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

1058. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

1059. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

1060.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

1061.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

1062.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

1063.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

1064.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

1065.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

1066.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

1067.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

1068.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

1069.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

1070.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

1071.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

1072.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

1073.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

1074.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

1075.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

1076.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

1077.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

1078.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

1079.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

1080.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

1081.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

1082.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.201 V5.3.0.

1083.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.302 V4.1.0.

1084.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V4.1.0.

1085.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.322 V4.1.0.

1086.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0.

1087.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.1.0.

1088.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.018 V4.4.0.

1089.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.002 V4.3.0.

1090.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0.

1091.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TR 21.905 V10.3.0.

1092.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.1 titled "General Protocol Architecture."

1093.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.201 V5.3.0, Section 4.1.2 titled "Service provided to higher layers."

1094.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.2 titled "Overview of L1 functions."

1095.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.302 V4.1.0, Section 5.3 titled "L1 interactions with L2 retransmission functionality."

1096.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

1097.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V4.1.0, Section 6.2.2 titled "Relation of MAC Functions and Transport Channels in UE."

1098.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.322 V4.1.0, Section 10 titled "Handling of unknown, unforeseen and erroneous protocol data."

1099.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1 titled "General."

1100.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.3 titled "Segmentation and concatenation of system information blocks."

1101.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.4 titled "Re-assembly of segments."

1102.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.1.5 titled "Scheduling of system information."

1103.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.3 titled "Reception of SYSTEM INFORMATION messages by the UE."

1104.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.1.1.6.16 titled "System Information Block type 16."

1105.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.2.48.8.19 titled "System Information Block type 16."

1106.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.7 titled "Predefined RB configuration."

1107.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.16 titled "RB identity."

1108.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.21 titled "RB mapping info."

1109.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.23 titled "RLC info."

1110.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.4.24 titled "Signalling RB information to setup."

1111.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.16 titled "Scheduling information."

1112.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.17 titled "SEG COUNT."

1113.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.8.18 titled "Segment index."

1114.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 8 titled "RRC procedures."

1115.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.1.0, Section 9.1 titled "General."

1116.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.018 V4.4.0, Section 3.2.1 titled "Mobile Station side."

1117.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.002 V4.3.0, Section 3.3.2.3 titled "Broadcast control channel (BCCH)."

1118.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 2 titled "General."

1119.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.1 titled "Overall process."

1120.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.2 titled "MS measurement procedure."

1121.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 3.4 titled "Strategy."

1122.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6 titled "Measurements for Cell Reselection."

1123.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 6.6.4 titled "Measurements on cells of other radio access technologies."

1124.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.1 titled "Monitoring the received signal level and PBCCH data."

1125.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.008 V4.3.0, Section 10.1.3.2 titled "Algorithm for cell re selection from GSM to UTRAN."

1126.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP TR 21.905 V10.3.0, Section 3 titled "Terms and definitions."

1127.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '959 patent.

1128.   Upon information and belief, Apple's infringement of the '959 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

1129.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

FIFTH COUNT

(Infringement of the '271 patent)

1130.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-1129 of this Complaint as though fully set forth herein.

1131.   Apple has infringed and is infringing the '271 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '271 patent.

1132.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '271 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '271 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '271 patent.

1133.   Apple's infringing activities have been and continue to be willful.

1134.   Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '271 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

1135.   Products made and sold in accordance with the following standards infringe one or more claims of the '271 patent:

        a. 3GPP Standard TS 23.060 V6.4.0;

        b. 3GPP Standard TS 44.060 V6.6.0;

        c. 3GPP Standard TS 44.064 V6.0.0;

        d. 3GPP Standard TS 44.065 V6.2.0.

1136. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0.

1137. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0.

1138. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0.

1139. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.065 V6.2.0.

1140. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1141. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1142. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1143. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1144. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1145.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS –

P-GW/GGSN."

1146.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb

mode)."

1147.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context

Activation Procedure."

1148.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1149.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service

Profile."

1150.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1151.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

1152.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of

service demand."

1153.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1154.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1155.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1156.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1157.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1158.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1159.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1160.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1161.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1162.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1163.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1164.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0.

1165.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0.

1166.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0.

1167.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.065 V6.2.0.

1168.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1169.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1170.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1171.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1172.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1173.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1174.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1175.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1176.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1177.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1178.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1179.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1180.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1181.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1182.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1183.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1184.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1185.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1186.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1187.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1188.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1189.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1190.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1191.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1192.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0.

1193.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0.

1194.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0.

1195.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.065 V6.2.0.

1196.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1197.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1198.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1199.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1200.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1201.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1202.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1203.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1

titled "PDP Context Activation Procedure."

1204.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2

titled "Subfunctions."

1205.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled

"Quality of Service Profile."

1206.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled

"Layer functions."

1207.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2

titled "Resource Reallocation for Uplink."

1208.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section

8.1.1.3a.5.2 titled "Change of service demand."

1209.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3

titled "RLC buffer."

1210.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1211.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1212.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1213.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1214.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1215.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1216.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1217.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1218.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1219.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1220.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0.

1221.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0.

1222.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0.

1223.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.065 V6.2.0.

1224.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1225.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1226.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1227.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1228.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1229.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1230.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1231.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1232.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1233.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1234.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1235.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1236.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1237.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1238.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1239.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1240.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1241.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1242.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1243.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1244.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1245.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1246.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1247. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1248. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0.

1249. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0.

1250. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0.

1251. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.065 V6.2.0.

1252. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1253. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1254. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1255. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1256.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1257.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1258.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1259.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1260.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1261.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1262.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1263.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1264.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1265.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1266.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1267.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1268.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1269.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1270.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1271.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1272.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1273.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1274.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1275.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1276.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0.

1277.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0.

1278.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0.

1279.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.065 V6.2.0.

1280.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1281.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1282.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1283.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1284.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1285.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1286.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1287.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1288.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1289.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1290.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1291.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1292.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1293.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1294.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation

of upper layer PDUs into RLC data units."

1295.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference

model."

1296.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer

structure."

1297.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service

Access Point Identifier (SAPI)."

1298.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer

service primitives."

1299.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of

the packet access procedure"

1300.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE -

RLC/MAC primitives."

1301.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-

DATA."

1302.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1303.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone

product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service

functions."

1304.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G

product complies with the 3GPP Standard TS 23.060 V6.4.0.

1305.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G

product complies with the 3GPP Standard TS 44.060 V6.6.0.

1306.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G

product complies with the 3GPP Standard TS 44.064 V6.0.0.

1307.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G

product complies with the 3GPP Standard TS 44.065 V6.2.0.

1308.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1309.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS

Architecture and Transmission Mechanism."

1310. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1311. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1312. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1313. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1314. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1315. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1316. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1317.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1318.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1319.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1320.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1321.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1322.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1323.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1324.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1325.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1326.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1327.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1328.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1329.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1330.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1331.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1332.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0.

1333.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0.

1334.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0.

1335.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.065 V6.2.0.

1336.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1337.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1338.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1339.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1340.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1341.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS –

P-GW/GGSN."

1342.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN

(A/Gb mode)."

1343.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context

Activation Procedure."

1344.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled

"Subfunctions."

1345.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of

Service Profile."

1346.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer

functions."

1347.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

1348.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change

of service demand."

1349.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC

buffer."

1350.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation

of upper layer PDUs into RLC data units."

1351.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference

model."

1352.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer

structure."

1353.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service

Access Point Identifier (SAPI)."

1354.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer

service primitives."

1355.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of

the packet access procedure"

1356.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE -

RLC/MAC primitives."

1357.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-

DATA."

1358.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1359.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS

product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service

functions."

1360.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 23.060 V6.4.0.

1361.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.060 V6.6.0.

1362.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.064 V6.0.0.

1363.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.065 V6.2.0.

1364.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1365.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1366.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1367.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1368.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1369.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1370.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1371.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1372. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1373. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1374. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1375. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1376. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1377. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1378. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1379.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1380.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1381.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1382.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1383.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1384.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1385.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1386.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1387.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service

functions."

1388.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0.

1389.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0.

1390.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0.

1391.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.065 V6.2.0.

1392.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1393.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS

Architecture and Transmission Mechanism."

1394.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access

Interfaces and Reference Points."

1395.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and

Control Planes."

1396.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane

(A/Gb mode)."

1397.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS –

P-GW/GGSN."

1398.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN

(A/Gb mode)."

1399.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context

Activation Procedure."

1400.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled

"Subfunctions."

1401.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of

Service Profile."

1402.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer

functions."

1403.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource

Reallocation for Uplink."

1404.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change

of service demand."

1405.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC

buffer."

1406.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation

of upper layer PDUs into RLC data units."

1407.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference

model."

1408.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer

structure."

1409.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service

Access Point Identifier (SAPI)."

1410. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1411. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1412. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1413. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1414. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1415. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1416. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0.

1417. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0.

1418. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0.

1419.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.065 V6.2.0.

1420.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 4 titled "Main Concept."

1421.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

1422.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.1 titled "GPRS Access Interfaces and Reference Points."

1423.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6 titled "User and Control Planes."

1424.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1 titled "User Plane (A/Gb mode)."

1425.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.1.1 titled "MS – P-GW/GGSN."

1426.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 5.6.3.1 titled "MS - SGSN (A/Gb mode)."

1427.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 9.2.2.1 titled "PDP Context Activation Procedure."

1428.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 12.3.2 titled "Subfunctions."

1429.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 15.2 titled "Quality of Service Profile."

1430.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4.2 titled "Layer functions."

1431.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

1432.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.3a.5.2 titled "Change of service demand."

1433.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

1434.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

1435.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.1 titled "Reference model."

1436.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 4.7 titled "LLC layer structure."

1437.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.2.3 titled "Service Access Point Identifier (SAPI)."

1438.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2 titled "LLC layer service primitives."

1439.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.1.2.1 titled "Initiation of the packet access procedure"

1440.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3 titled "LLE - RLC/MAC primitives."

1441. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.3.1 titled "GRR-DATA."

1442. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 4 titled "General."

1443. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.065 V6.2.0, Section 5.2 titled "Service functions."

1444. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '271 patent.

1445. Upon information and belief, Apple's infringement of the '271 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

1446. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

SIXTH COUNT

(Infringement of the '321 patent)

1447. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-1446 of this Complaint as though fully set forth herein.

1448. Apple has infringed and is infringing the '321 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with

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Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple

iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the '321 patent.

1449.   Apple has induced infringement and/or contributed to the infringement, and is

inducing infringement and/or contributing to the infringement of the '321 Patent by making,

using, offering to sell, and/or selling in the United States, and/or importing into the United

States, without authority, products and services including wireless communication devices

including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation),

Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple

iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the

'321 patent, including selling the products and services to customers. Apple's customers who

purchase products and services thereof and operate such products and services thereof in

accordance with Apple's instructions directly infringe one or more claims of the '321 patent.

1450.   Apple's infringing activities have been and continue to be willful.

1451.   Upon information and belief, at least as early as June 14, 2011, upon settlement of

all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June

14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '321 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing

activities.

1452.   Products made and sold in accordance with the following standards infringe one

or more claims of the '321 patent:

> a.   3GPP Standard TS 25.211 V5.0.0;
>
> b.   3GPP Standard TS 25.213 V5.0.0;
>
> c.   3GPP Standard TS 25.213 V7.7.0.

1453.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V5.0.0.

1454.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0.

1455.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V7.7.0.

1456.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1457.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1458.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1459.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1460.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1461.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1462.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1463.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1464.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1465.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1466.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1467.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V5.0.0.

1468.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0.

1469.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V7.7.0.

1470.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1471. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1472. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1473. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1474. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1475. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1476. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1477. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1478. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1479.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1480.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1481.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V5.0.0.

1482.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0.

1483.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V7.7.0.

1484.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1485.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1486.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1487.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1488.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1489.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1490.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1491.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1492.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1493.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1494.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1495.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V5.0.0.

1496.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0.

1497.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V7.7.0.

1498.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1499.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1500.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1501.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1502.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1503.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1504.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1505.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1506.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1507.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1508.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1509.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V5.0.0.

1510.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0.

1511.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V7.7.0.

1512.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1513.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1514.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1515.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1516.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1517.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1518.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1519.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1520.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1521.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1522.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1523.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V5.0.0.

1524.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0.

1525.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V7.7.0.

1526.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1527.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1528.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1529.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1530.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1531.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1532.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1533.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1534.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1535.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1536.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1537.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V5.0.0.

1538.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0.

1539.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V7.7.0.

1540.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1541.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1542.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1543.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1544.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1545.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1546.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1547.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1548.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1549.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1550.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1551.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V5.0.0.

1552.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0.

1553.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V7.7.0.

1554.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1555.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1556.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1557.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1558.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1559.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1560.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1561.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1562.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1563.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1564.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1565.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V5.0.0.

1566.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0.

1567.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V7.7.0.

1568.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1569.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1570.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1571.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1572.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1573.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1574.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1575.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1576.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1577.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1578.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1579.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V5.0.0.

1580.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0.

1581. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V7.7.0.

1582. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V5.0.0, Section 5.2. titled "Uplink physical channels."

1583. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 3.2 titled "Abbreviations."

1584. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4 titled "Uplink spreading and modulation."

1585. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.2.1 titled "DPCCH/DPDCH/HS-DPCCH."

1586. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2 titled "Scrambling Codes."

1587. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.1 titled "General."

1588. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.2 titled "Long scrambling sequence."

1589.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.3 titled "Short scrambling sequence."

1590.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.3.2.4 titled "DPCCH/DPDCH/HS-DPCCH scrambling code."

1591.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V5.0.0, Section 4.4.2 titled "Modulation."

1592.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.213 V7.7.0, Section 4.2.1.1 titled "DPCCH/DPDCH."

1593.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '321 patent.

1594.   Upon information and belief, Apple's infringement of the '321 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

1595.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

SEVENTH COUNT

(Infringement of the '143 patent)

1596.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-1595 of this Complaint as though fully set forth herein.

1597.   Apple has infringed and is infringing the '143 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '143 patent.

1598.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '143 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '143 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '143 patent.

1599.   Apple's infringing activities have been and continue to be willful.

1600.   Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '143 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

1601.   Products made and sold in accordance with the following standards infringe one or more claims of the '143 patent:

> a.   3GPP Standard TS 25.211 V4.0.0;
>
> b.   3GPP Standard TS 25.303 V4.0.0;
>
> c.   3GPP Standard TS 25.331 V4.0.0.

1602.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standards TS 25.211 V4.0.0.

1603.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standards TS 25.303 V4.0.0.

1604.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0.

1605.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1606.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1607.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1608.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1609.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1610.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1611.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1612.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1613.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1614.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1615.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1616.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1617.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1618.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1619.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1620.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1621.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1622.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1623.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1624.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standards TS 25.211 V4.0.0.

1625.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standards TS 25.303 V4.0.0.

1626.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0.

1627.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1628.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1629.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1630.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1631.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1632.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1633.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1634.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1635.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1636.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1637.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1638.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1639.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1640.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1641.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1642.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1643.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1644.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1645.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1646.

1647.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standards TS 25.211 V4.0.0.

1648.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standards TS 25.303 V4.0.0.

1649.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0.

1650.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1651.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1652.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1653.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1654.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1655.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1656.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1657.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1658.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1659.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1660.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1661.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1662.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1663.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1664.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1665.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1666.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1667.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1668.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1669.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standards TS 25.211 V4.0.0.

1670.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standards TS 25.303 V4.0.0.

1671.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0.

1672.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1673.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1674.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1675.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1676.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1677.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1678.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1679.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1680.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1681.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1682.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1683. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1684. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1685. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1686. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1687. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1688. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1689. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1690.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1691.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standards TS 25.211 V4.0.0.

1692.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standards TS 25.303 V4.0.0.

1693.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0.

1694.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1695.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1696.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1697.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1698.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1699.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1700.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1701.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1702.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1703.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1704.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1705.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1706.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1707.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1708.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1709.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1710.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1711.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1712.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1713.

1714.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standards TS 25.211 V4.0.0.

1715.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standards TS 25.303 V4.0.0.

1716.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0.

1717.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1718.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1719.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1720.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1721. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1722. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1723. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1724. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1725. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1726. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1727. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1728.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1729.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1730.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1731.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1732.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1733.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1734.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1735.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1736.

1737.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standards TS 25.211 V4.0.0.

1738.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standards TS 25.303 V4.0.0.

1739.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0.

1740.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1741.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1742.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1743.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1744.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1745.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1746.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1747.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1748.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1749.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1750.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1751.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1752.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1753.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1754.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1755.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1756.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1757.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1758.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1759.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standards TS 25.211 V4.0.0.

1760.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standards TS 25.303 V4.0.0.

1761.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0.

1762.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1763.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1764.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1765.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1766. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1767. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1768. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1769. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1770. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1771. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1772. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1773.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1774.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1775.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1776.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1777.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1778.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1779.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1780.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1781.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standards TS 25.211 V4.0.0.

1782.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standards TS 25.303 V4.0.0.

1783.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0.

1784.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1785.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1786.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1787.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1788.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

1789.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume Monitoring."

1790.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement procedures."

1791.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement related definitions."

1792.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement control"

1793.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of MEASUREMENT CONTROL by the UE."

1794.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement Information elements."

1795.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled "Measurement Type."

1796.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic volume event identity."

1797.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic volume measured results list."

1798.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic volume measurement reporting criteria."

1799.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic Volume Measurement Quantity."

1800.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic Volume reporting triggers."

1801.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1802.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1803.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standards TS 25.211 V4.0.0.

1804.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standards TS 25.303 V4.0.0.

1805.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0.

1806.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.1.1 titled "DCH - Dedicated Channel."

1807.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V4.0.0, Section 4.1.2.4 titled "RACH - Random Access Channel."

1808.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 5.2 titled "Typical configuration cases."

1809.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

1810.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 6.2.3.1 titled "UE-

Originated DCH Activation."

1811.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.303 V4.0.0, Section 7 titled "Traffic Volume

Monitoring."

1812.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4 titled "Measurement

procedures."

1813.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.0 titled "Measurement

related definitions."

1814.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1 titled "Measurement

control"

1815.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 8.4.1.3 titled "Reception of

MEASUREMENT CONTROL by the UE."

1816.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7 titled "Measurement

Information elements."

1817.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.50 titled

"Measurement Type."

1818.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.66 titled "Traffic

volume event identity."

1819.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.67 titled "Traffic

volume measured results list."

1820.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 10.3.7.72 titled "Traffic

volume measurement reporting criteria."

1821.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.1 titled "Traffic

Volume Measurement Quantity."

1822.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2 titled "Traffic

Volume reporting triggers."

1823.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.1 titled "Reporting

event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold."

1824.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.0.0, Section 14.4.2.2 titled "Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold."

1825.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '143 patent.

1826.   Upon information and belief, Apple's infringement of the '143 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

1827.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

EIGHTH COUNT

(Infringement of the '850 patent)

1828.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-1827 of this Complaint as though fully set forth herein.

1829.   Apple has infringed and is infringing the '850 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the '850 patent.

1830.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '850 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices

including but not limited to the Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the '850 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '850 patent.

1831. Apple's infringing activities have been and continue to be willful.

1832. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '850 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

1833. Products made and sold in accordance with the following standards infringe one or more claims of the '850 patent:

      a. 3GPP Standard TS 25.211 V7.1.0;

      b. 3GPP Standard TS 25.308 V7.2.0;

      c. 3GPP Standard TS 25.321 V7.8.0;

      d. 3GPP Standard TS 25.331 V7.4.0;

      e. 3GPP Standard TS 34.123-1 V8.1.0;

      f. 3GPP Standard TS 34.123-1 V8.2.0.

1834. Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V7.1.0.

1835.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V7.2.0.

1836.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V7.8.0.

1837.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V7.4.0.

1838.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.1.0.

1839.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0.

1840.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 3.2 titled "Abbreviations."

1841.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 5.2.1.1 titled "DPCCH and DPDCH."

1842.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1 titled "Discontinuous uplink transmission."

1843.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1.1 titled "Uplink DRX."

1844.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 3.1.3 titled "DTX-DRX and HS-SCCH less Specific definitions (FDD only)."

1845.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2 titled "MAC architecture."

1846.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2.1 titled "MAC Entities."

1847.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 9.1.5 titled "MAC PDU (E-DCH)."

1848.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 11.8.1.4 titled "E-TFC Selection."

1849.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 8.6.6.39 titled "DTX-DRX information (FDD only)."

1850.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.4.21 titled "RB mapping info."

1851.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.6.34a titled "DTX-DRX information."

1852.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 13.4.3b titled "DTX_DRX_PARAMS."

1853.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.1.0, Section 8.2.1.38 titled "Radio Bearer Establishment for transition from CELL_DCH to CELL_DCH: Success (start of discontinuous uplink transmission)."

1854.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.51 titled "Radio Bearer Reconfiguration from CELL_DCH to CELL_DCH: Success (With active discontinuous uplink transmission)."

1855.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.52 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (start and stop of discontinuous uplink transmission)."

1856.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.53 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (hard handover to another frequency, start and stop of discontinuous uplink transmission)."

1857.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.54 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (frequency modification, start and stop of discontinuous uplink transmission)."

1858.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.55 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (Start and stop of discontinuous uplink transmission)."

1859.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.56 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_PCH: Success (stop of discontinuous uplink transmission)."

1860.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V7.1.0.

1861.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V7.2.0.

1862.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V7.8.0.

1863.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V7.4.0.

1864.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.1.0.

1865.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0.

1866.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 3.2 titled "Abbreviations."

1867.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 5.2.1.1 titled "DPCCH and DPDCH."

1868.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1 titled "Discontinuous uplink transmission."

1869.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1.1 titled "Uplink DRX."

1870.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 3.1.3 titled "DTX-DRX and HS-SCCH less Specific definitions (FDD only)."

1871.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2 titled "MAC architecture."

1872.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2.1 titled "MAC Entities."

1873.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 9.1.5 titled "MAC PDU (E-DCH)."

1874.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 11.8.1.4 titled "E-TFC Selection."

1875.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 8.6.6.39 titled "DTX-DRX information (FDD only)."

1876.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.4.21 titled "RB mapping info."

1877.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.6.34a titled "DTX-DRX information."

1878.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 13.4.3b titled "DTX_DRX_PARAMS."

1879.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.1.0, Section 8.2.1.38 titled "Radio Bearer Establishment for transition from CELL_DCH to CELL_DCH: Success (start of discontinuous uplink transmission)."

1880.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.51 titled "Radio Bearer Reconfiguration from CELL_DCH to CELL_DCH: Success (With active discontinuous uplink transmission)."

1881.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.52 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (start and stop of discontinuous uplink transmission)."

1882.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.53 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (hard handover to another frequency, start and stop of discontinuous uplink transmission)."

1883.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.54 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (frequency modification, start and stop of discontinuous uplink transmission)."

1884.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.55 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (Start and stop of discontinuous uplink transmission)."

1885.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.56

titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_PCH: Success (stop of discontinuous uplink transmission)."

1886.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V7.1.0.

1887.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V7.2.0.

1888.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V7.8.0.

1889.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V7.4.0.

1890.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.1.0.

1891.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0.

1892.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 3.2 titled "Abbreviations."

1893.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 5.2.1.1 titled "DPCCH and DPDCH."

1894.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1 titled "Discontinuous uplink transmission."

1895.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1.1 titled "Uplink DRX."

1896.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 3.1.3 titled "DTX-DRX and HS-SCCH less Specific definitions (FDD only)."

1897.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2 titled "MAC architecture."

1898.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2.1 titled "MAC Entities."

1899.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 9.1.5 titled "MAC PDU (E-DCH)."

1900.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 11.8.1.4 titled "E-TFC Selection."

1901.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 8.6.6.39 titled "DTX-DRX information (FDD only)."

1902. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.4.21 titled "RB mapping info."

1903. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.6.34a titled "DTX-DRX information."

1904. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 13.4.3b titled "DTX_DRX_PARAMS."

1905. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.1.0, Section 8.2.1.38 titled "Radio Bearer Establishment for transition from CELL_DCH to CELL_DCH: Success (start of discontinuous uplink transmission)."

1906. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.51 titled "Radio Bearer Reconfiguration from CELL_DCH to CELL_DCH: Success (With active discontinuous uplink transmission)."

1907. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.52 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (start and stop of discontinuous uplink transmission)."

1908. Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.53 titled "Radio

Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (hard handover to another frequency, start and stop of discontinuous uplink transmission)."

1909.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.54 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (frequency modification, start and stop of discontinuous uplink transmission)."

1910.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.55 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (Start and stop of discontinuous uplink transmission)."

1911.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.56 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_PCH: Success (stop of discontinuous uplink transmission)."

1912.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V7.1.0.

1913.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V7.2.0.

1914.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.321 V7.8.0.

1915.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V7.4.0.

1916.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.1.0.

1917.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0.

1918.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 3.2 titled "Abbreviations."

1919.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 5.2.1.1 titled "DPCCH and DPDCH."

1920.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1 titled "Discontinuous uplink transmission."

1921.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1.1 titled "Uplink DRX."

1922.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 3.1.3 titled "DTX-DRX and HS-SCCH less Specific definitions (FDD only)."

1923.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2 titled "MAC architecture."

1924.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2.1 titled "MAC

Entities."

1925.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 9.1.5 titled "MAC PDU (E-

DCH)."

1926.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 11.8.1.4 titled "E-TFC

Selection."

1927.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 8.6.6.39 titled "DTX-DRX

information (FDD only)."

1928.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.4.21 titled "RB

mapping info."

1929.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.6.34a titled "DTX-

DRX information."

1930.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 13.4.3b titled

"DTX_DRX_PARAMS."

1931.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 34.123-1 V8.1.0, Section 8.2.1.38 titled "Radio

Bearer Establishment for transition from CELL_DCH to CELL_DCH: Success (start of discontinuous uplink transmission)."

1932.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.51 titled "Radio Bearer Reconfiguration from CELL_DCH to CELL_DCH: Success (With active discontinuous uplink transmission)."

1933.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.52 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (start and stop of discontinuous uplink transmission)."

1934.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.53 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (hard handover to another frequency, start and stop of discontinuous uplink transmission)."

1935.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.54 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (frequency modification, start and stop of discontinuous uplink transmission)."

1936.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.55 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (Start and stop of discontinuous uplink transmission)."

1937. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.56 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_PCH: Success (stop of discontinuous uplink transmission)."

1938. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V7.1.0.

1939. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V7.2.0.

1940. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V7.8.0.

1941. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V7.4.0.

1942. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 34.123-1 V8.1.0.

1943. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 34.123-1 V8.2.0.

1944. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 3.2 titled "Abbreviations."

1945. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.211 V7.1.0, Section 5.2.1.1 titled "DPCCH and DPDCH."

1946.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1 titled "Discontinuous uplink transmission."

1947.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.308 V7.2.0, Section 11.1.1 titled "Uplink DRX."

1948.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 3.1.3 titled "DTX-DRX and HS-SCCH less Specific definitions (FDD only)."

1949.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2 titled "MAC architecture."

1950.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 4.2.1 titled "MAC Entities."

1951.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 9.1.5 titled "MAC PDU (E-DCH)."

1952.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.321 V7.8.0, Section 11.8.1.4 titled "E-TFC Selection."

1953.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 8.6.6.39 titled "DTX-DRX

information (FDD only)."

1954.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.4.21 titled "RB

mapping info."

1955.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 10.3.6.34a titled "DTX-

DRX information."

1956.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 25.331 V7.4.0, Section 13.4.3b titled

"DTX_DRX_PARAMS."

1957.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 34.123-1 V8.1.0, Section 8.2.1.38 titled "Radio

Bearer Establishment for transition from CELL_DCH to CELL_DCH: Success (start of

discontinuous uplink transmission)."

1958.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.51 titled "Radio

Bearer Reconfiguration from CELL_DCH to CELL_DCH: Success (With active discontinuous

uplink transmission)."

1959.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.52 titled "Radio

Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (start and stop of discontinuous uplink transmission)."

1960. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.53 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (hard handover to another frequency, start and stop of discontinuous uplink transmission)."

1961. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.54 titled "Radio Bearer Reconfiguration for transition from CELL_FACH to CELL_DCH and CELL_DCH to CELL_FACH: Success (frequency modification, start and stop of discontinuous uplink transmission)."

1962. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.55 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_DCH: Success (Start and stop of discontinuous uplink transmission)."

1963. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 34.123-1 V8.2.0, Section 8.2.2.56 titled "Radio Bearer Reconfiguration for transition from CELL_DCH to CELL_PCH: Success (stop of discontinuous uplink transmission)."

1964. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '850 patent.

1965.   Upon information and belief, Apple's infringement of the '850 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

1966.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

NINTH COUNT

(Infringement of the '679 patent)

1967.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-1966 of this Complaint as though fully set forth herein.

1968.   Apple has infringed and is infringing the '679 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the '679 patent.

1969.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '679 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the '679 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '679 patent.

1970. Apple's infringing activities have been and continue to be willful.

1971. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '679 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

1972. Products made and sold in accordance with the following standards infringe one or more claims of the '679 patent:

      a. 3GPP Standard TS 26.093 V5.0.0;

      b. 3GPP Standard TS 43.051 V5.6.0;

      c. 3GPP Standard TS 45.003 V5.5.0;

      d. 3GPP Standard TS 45.004 V5.1.0.

1973. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0.

1974. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.051 V5.6.0.

1975. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0.

1976. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.004 V5.1.0.

1977. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

1978.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

1979.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

1980.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

1981.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

1982.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

1983.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

1984.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

1985.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

1986.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

1987.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

1988.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

1989.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0.

1990.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.051 V5.6.0.

1991.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0.

1992.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.004 V5.1.0.

1993.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

1994.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

1995.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

1996.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

1997.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

1998.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

1999.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2000.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2001. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2002. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2003. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2004. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2005. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0.

2006. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.051 V5.6.0.

2007. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0.

2008. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.004 V5.1.0.

2009. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2010. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2011. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2012. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2013. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2014. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2015. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2016. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2017. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2018. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2019. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2020. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2021. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0.

2022. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.051 V5.6.0.

2023. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0.

2024. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.004 V5.1.0.

2025. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2026.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2027.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2028.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2029.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2030.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2031.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2032.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2033.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2034.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2035.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2036.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2037.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0.

2038.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.051 V5.6.0.

2039.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0.

2040.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.004 V5.1.0.

2041.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2042.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2043.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2044.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2045.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2046.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2047.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2048.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2049.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2050.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2051.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2052.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2053.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '679 patent.

2054.   Upon information and belief, Apple's infringement of the '679 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

2055.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

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TENTH COUNT

(Infringement of the '045 patent)

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2056.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-2055 of this Complaint as though fully set forth herein.

2057.   Apple has infringed and is infringing the '045 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the '045 patent.

2058.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '045 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5, that are covered by one or more claims of the '045 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '045 patent.

2059.   Apple's infringing activities have been and continue to be willful.

2060.   Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '045 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

2061.   Products made and sold in accordance with the following standards infringe one or more claims of the '045 patent:

> a.   3GPP Standard TS 26.093 V5.0.0;

b.   3GPP Standard TS 43.051 V5.6.0;

c.   3GPP Standard TS 45.003 V5.5.0;

d.   3GPP Standard TS 45.004 V5.1.0.

2062.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0.

2063.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.051 V5.6.0.

2064.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0.

2065.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.004 V5.1.0.

2066.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2067.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2068.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2069.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2070. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2071. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2072. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2073. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2074. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2075. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2076. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2077. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2078.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0.

2079.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.051 V5.6.0.

2080.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0.

2081.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.004 V5.1.0.

2082.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2083.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2084.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2085.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2086.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2087.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2088.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2089.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2090.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2091.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2092.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2093.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2094.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0.

2095.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.051 V5.6.0.

2096.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0.

2097.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.004 V5.1.0.

2098.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2099.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2100.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2101.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2102.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2103.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2104.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2105.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2106.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2107.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2108.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2109.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2110.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0.

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2111.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.051 V5.6.0.

2112.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0.

2113.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.004 V5.1.0.

2114.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2115.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2116.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2117.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2118.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2119. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2120. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2121. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2122. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2123. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2124. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2125. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2126. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0.

2127.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.051 V5.6.0.

2128.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0.

2129.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.004 V5.1.0.

2130.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5 titled "AMR SCR operation."

2131.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section 5.2 titled "Receive (RX) side."

2132.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5 titled "Transmit (TX) side."

2133.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.5.1.2.4 titled "Functions of the TX Radio Subsystem for RATSCCH."

2134.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 26.093 V5.0.0, Section A.6 titled "Receive (RX) side."

2135.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.051 V5.6.0, Section 6.8.7 titled "Channel Coding."

2136.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 2.1 titled "General organization."

2137.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.10 titled "Adaptive multi rate speech channel at half rate (TCH/AHS)."

2138.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15 titled "Adaptive multi rate speech channel at 8-PSK half rate (O-TCH/AHS)."

2139.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Section 3.15.9.3 titled "Interleaving."

2140.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.003 V5.5.0, Annex C titled "Change history."

2141.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 45.004 V5.1.0, Section 3 titled "Modulation format for 8PSK."

2142.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '045 patent.

2143.   Upon information and belief, Apple's infringement of the '045 patent is willful

entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs

incurred in prosecuting this action under 35 U.S.C. § 285.

2144.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is

entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful

acts in an amount subject to proof at trial.

ELEVENTH COUNT

(Infringement of the '860 patent)

2145.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-2144

of this Complaint as though fully set forth herein.

2146.   Apple has infringed and is infringing the '860 patent by making, using, offering to

sell, and/or selling in the United States, and/or importing into the United States, without

authority, products and services including wireless communication devices including but not

limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with

Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple

iPhone 4, Apple iPhone 4S, and Apple iPhone 5 that are covered by one or more claims of the

'860 patent.

2147.   Apple has induced infringement and/or contributed to the infringement, and is

inducing infringement and/or contributing to the infringement of the '860 Patent by making,

using, offering to sell, and/or selling in the United States, and/or importing into the United

States, without authority, products and services including wireless communication devices

including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation),

Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone

3GS, Apple iPhone 4, Apple iPhone 4S, and Apple iPhone 5 that are covered by one or more

claims of the '860 patent, including selling the products and services to customers. Apple's

customers who purchase products and services thereof and operate such products and services

thereof in accordance with Apple's instructions directly infringe one or more claims of the '860

patent.

2148.   Apple's infringing activities have been and continue to be willful.

2149.   Upon information and belief, at least as early as June 14, 2011, upon settlement of

all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June

14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '860 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing

activities.

2150.   Products made and sold in accordance with the following standards infringe one

or more claims of the '860 patent:

       a.   3GPP Standard TS 23.271 V4.1.0;

       b.   3GPP Standard TS 25.305 V4.0.0;

       c.   3GPP Standard TS 25.331 V4.3.0;

       d.   3GPP Standard TS 43.059 V4.5.0;

       e.   3GPP Standard TS 44.035 V4.0.0.

2151.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.271 V4.1.0.

2152.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 25.305 V4.0.0.

2153.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 25.331 V4.3.0.

2154.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 43.059 V4.5.0.

2155.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.035 V4.0.0.

2156.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2157.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2158.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2159.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2160.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2161.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2162.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2163.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2164.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2165.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2166.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2167.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2168.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2169.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2170.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2171.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2172.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2173.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2174.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2175.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.271 V4.1.0.

2176.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.305 V4.0.0.

2177.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V4.3.0.

2178.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 43.059 V4.5.0.

2179.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.035 V4.0.0.

2180.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2181.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2182.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2183.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2184.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2185.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2186.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2187.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position

determination."

2188.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE

positioning Ciphering info."

2189.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled

"UE_POSITIONING_GPS_DATA."

2190.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled

"UE_POSITIONING_OTDOA_DATA_UE_BASED."

2191.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning

Request."

2192.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of

Assistance Data."

2193.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2194.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2

product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled

"Algorithm."

2195.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2196.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2197.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2198.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2199.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.271 V4.1.0.

2200.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0.

2201.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.3.0.

2202.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 43.059 V4.5.0.

2203.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.035 V4.0.0.

2204.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2205.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2206.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2207.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2208.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2209.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2210.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2211.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2212.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2213.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2214.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2215.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2216.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2217.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2218.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1

titled "Algorithm."

2219.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3

titled "Deciphering key control and delivery to MS."

2220.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled

"E-OTD Assistance Data Broadcast Message Content."

2221.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1

titled "Message Structure Definition IE."

2222.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled

"GPS Assistance Data Content."

2223.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 23.271 V4.1.0.

2224.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0.

2225.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 25.331 V4.3.0.

2226.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 43.059 V4.5.0.

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2227.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.035 V4.0.0.

2228.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2229.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2230.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2231.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2232.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2233.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2234.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2235. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2236. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2237. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2238. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2239. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2240. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2241. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2242.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2243.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2244.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2245.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2246.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2247.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.271 V4.1.0.

2248.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0.

2249.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.3.0.

2250.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 43.059 V4.5.0.

2251.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.035 V4.0.0.

2252.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2253.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2254.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2255.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2256.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2257.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2258.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2259.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2260.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2261.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2262.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2263.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2264.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2265.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2266.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2267.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2268.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2269.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2270.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2271.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.271 V4.1.0.

2272.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0.

2273.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.331 V4.3.0.

2274.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 43.059 V4.5.0.

2275.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.035 V4.0.0.

2276.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2277.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2278.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2279.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2280.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2281.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2282.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2283.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2284.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2285.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2286.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2287.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2288.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2289.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2290.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2291.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2292.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2293.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2294.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2295.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.271 V4.1.0.

2296.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0.

2297.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.3.0.

2298.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.059 V4.5.0.

2299.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.035 V4.0.0.

2300. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2301. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2302. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2303. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2304. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2305. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2306. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2307.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2308.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2309.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2310.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2311.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2312.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2313.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2314.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2315.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2316.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2317.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2318.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2319.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.271 V4.1.0.

2320.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0.

2321.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.3.0.

2322.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.059 V4.5.0.

2323.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.035 V4.0.0.

2324.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2325.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2326.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2327.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2328.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2329.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2330.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2331. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2332. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2333. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2334. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2335. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2336. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2337. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2338. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2339.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2340.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2341.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2342.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2343.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.271 V4.1.0.

2344.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0.

2345.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.3.0.

2346.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.059 V4.5.0.

2347.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.035 V4.0.0.

2348.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2349.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2350.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2351.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2352.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2353.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2354.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2355.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2356.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2357.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2358.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2359.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2360.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2361.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2362.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2363.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2364.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2365.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2366.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2367.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.271 V4.1.0.

2368.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0.

2369.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.3.0.

2370.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.059 V4.5.0.

2371.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.035 V4.0.0.

2372.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2373.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2374.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2375.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2376.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2377.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2378.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2379.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2380.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2381.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2382.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2383.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2384.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2385.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2386.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2387.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2388.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2389.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2390.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2391.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.271 V4.1.0.

2392.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0.

2393.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.3.0.

2394.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.059 V4.5.0.

2395.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.035 V4.0.0.

2396.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.1 titled "Circuit Switched Mobile Terminating Location Request (CS-MT-LR)."

2397.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.271 V4.1.0, Section 9.2.2 titled "Positioning Measurement Establishment Procedure."

2398.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.3 titled "Broadcast of Assistance Data."

2399.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.5 titled "UE Positioning Assistance Data Ciphering."

2400.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 6.6.4.1.6 titled "UE Positioning Assistance Data Ciphering Algorithm."

2401.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 9 titled "OTDOA positioning method."

2402.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.2 titled "Timing assistance."

2403.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.305 V4.0.0, Section 10.5 titled "Position determination."

2404.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 8.6.7.19.4 titled "UE positioning Ciphering info."

2405.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28a titled "UE_POSITIONING_GPS_DATA."

2406.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 25.331 V4.3.0, Section 13.4.28c titled "UE_POSITIONING_OTDOA_DATA_UE_BASED."

2407.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.2 titled "Positioning Request."

2408.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6 titled "Broadcast of Assistance Data."

2409.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2 titled "Ciphering."

2410.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.2.1 titled "Algorithm."

2411. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 43.059 V4.5.0, Section 9.4.6.3 titled "Deciphering key control and delivery to MS."

2412. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1 titled "E-OTD Assistance Data Broadcast Message Content."

2413. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.1.1.1 titled "Message Structure Definition IE."

2414. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.035 V4.0.0, Section 4.2.1 titled "GPS Assistance Data Content."

2415. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '860 patent.

2416. Upon information and belief, Apple's infringement of the '860 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

2417. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

TWELFTH COUNT

(Infringement of the '022 patent)

2418. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-2417 of this Complaint as though fully set forth herein.

2419. Apple has infringed and is infringing the '022 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '022 patent.

2420. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '022 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '022 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '022 patent.

2421. Apple's infringing activities have been and continue to be willful.

2422. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '022 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

2423.   Products made and sold in accordance with the following standards infringe one or more claims of the '022 patent:

        a.   3GPP Standard TS 04.60 V8.3.0;

        b.   3GPP Standard TS 05.08 V8.4.0;

2424.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 04.60 V8.3.0.

2425.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0.

2426.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2427.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2428.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2429.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2430.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 04.60 V8.3.0.

2431.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0.

2432.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2433.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2434.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2435.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2436.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 04.60 V8.3.0.

2437.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0.

2438.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2439.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2440.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2441.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2442.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 04.60 V8.3.0.

2443.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0.

2444.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2445.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2446.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2447.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2448.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 04.60 V8.3.0.

2449.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0.

2450.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2451.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2452.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2453.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2454.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 04.60 V8.3.0.

2455.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0.

2456.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2457.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2458.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2459.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2460.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 04.60 V8.3.0.

2461.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0.

2462.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2463.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2464.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2465.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2466.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 04.60 V8.3.0.

2467.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0.

2468.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2469.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2470.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2471.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2472.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 04.60 V8.3.0.

2473.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0.

2474.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2475.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2476.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2477.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2478.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 04.60 V8.3.0.

2479.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0.

2480.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2481.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2482.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2483.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2484.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 04.60 V8.3.0.

2485.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0.

2486.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2487.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2488.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2489. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2490. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '022 patent.

2491. Upon information and belief, Apple's infringement of the '022 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

2492. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

THIRTEENTH COUNT

(Infringement of the '664 patent)

2493. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-2492 of this Complaint as though fully set forth herein.

2494. Apple has infringed and is infringing the '664 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '664 patent.

2495. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '664 Patent by making,

using, offering to sell, and/or selling in the United States, and/or importing into the United

States, without authority, products and services including wireless communication devices

including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation),

Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone

3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more

claims of the '664 patent, including selling the products and services to customers. Apple's

customers who purchase products and services thereof and operate such products and services

thereof in accordance with Apple's instructions directly infringe one or more claims of the '664

patent.

2496. Apple's infringing activities have been and continue to be willful.

2497. Upon information and belief, at least as early as June 14, 2011, upon settlement of

all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June

14, 2011 press release attached hereto as Exhibit 15), Apple was aware of the '664 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing

activities.

2498. Products made and sold in accordance with the following standards infringe one

or more claims of the '664 patent:

      a. 3GPP Standard TS 04.60 V8.3.0;

      b. 3GPP Standard TS 05.08 V8.4.0;

2499. Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 04.60 V8.3.0.

2500. Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 05.08 V8.4.0.

2501.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2502.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2503.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2504.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2505.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 04.60 V8.3.0.

2506.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0.

2507.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2508.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2509.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2510.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2511.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 04.60 V8.3.0.

2512.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0.

2513.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2514.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2515.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2516.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2517.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 04.60 V8.3.0.

2518.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0.

2519.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2520.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2521.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2522.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2523.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 04.60 V8.3.0.

2524.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0.

2525.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2526.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2527.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2528.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2529.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 04.60 V8.3.0.

2530.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0.

2531.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2532.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2533.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2534.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2535.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 04.60 V8.3.0.

2536.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0.

2537.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2538.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2539.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2540.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2541.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 04.60 V8.3.0.

2542.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0.

2543.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2544.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2545.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2546.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2547.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 04.60 V8.3.0.

2548.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0.

2549.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2550.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2551.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2552.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2553.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 04.60 V8.3.0.

2554.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0.

2555.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2556.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2557.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2558.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2559.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 04.60 V8.3.0.

2560.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0.

2561.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 04.60 V8.3.0, Section 11.2.7 titled "Packet Downlink Assignment."

2562.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 8.2.3 titled "Statistical parameters."

2563.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.2.3.2.1 titled "Packet transfer mode."

2564.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 05.08 V8.4.0, Section 10.4 titled "Control parameters or MAC-Shared state."

2565.   Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '664 patent.

2566.   Upon information and belief, Apple's infringement of the '664 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

2567.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

FOURTHEENTH COUNT

(Infringement of the '689 patent)

2568.   Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-2567 of this Complaint as though fully set forth herein.

2569.   Apple has infringed and is infringing the '689 patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '689 patent.

2570.   Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '689 Patent by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, without authority, products and services including wireless communication devices including but not limited to the Apple iPad, Apple iPad 2, Apple new iPad (3rd generation), Apple iPad with Retina display, Apple iPad mini, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, Apple iPhone 4S and Apple iPhone 5, that are covered by one or more claims of the '689 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services

thereof in accordance with Apple's instructions directly infringe one or more claims of the '689

patent.

2571.   Products made and sold in accordance with the following standards infringe one

or more claims of the '689 patent:

      a.   3GPP Standard TS 23.060 V6.4.0;

      b.   3GPP Standard TS 44.060 V6.6.0;

      c.   3GPP Standard TS 44.064 V6.0.0.

2572.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standards TS 23.060 V6.4.0.

2573.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0.

2574.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.064 V6.0.0.

2575.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update

Procedure."

2576.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio

interface."

2577.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product

complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block

Flow."

2578.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2579.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2580.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2581.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2582.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2583.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2584.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2585.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2586.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2587.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2588.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2589.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2590.   Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2591.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standards TS 23.060 V6.4.0.

2592.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0.

2593.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0.

2594.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2595.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2596.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2597.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2598.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2599.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2600.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2601.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2602.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2603.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2604.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2605.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2606.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2607.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2608.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2609.   Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2610.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standards TS 23.060 V6.4.0.

2611.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0.

2612.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0.

2613.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2614.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2615.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2616.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2617.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2618.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2619.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2620.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2621.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2622.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2623.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2624.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad (3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2625.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled

"Control field formats, parameters, and variables."

2626.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7

titled "NULL command."

2627.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled

"Combined Information (I) and Supervisory (S) frames."

2628.   Plaintiff is informed and believes, and on such basis alleges, that the new iPad

(3rd generation) product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3

titled "LLGMM-TRIGGER."

2629.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standards TS 23.060 V6.4.0.

2630.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0.

2631.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0.

2632.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with

Retina display product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled

"Cell Update Procedure."

2633.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2634.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2635.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2636.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2637.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2638.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2639.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2640. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2641. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2642. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2643. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2644. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2645. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2646. Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2647.   Plaintiff is informed and believes, and on such basis alleges, that the iPad with Retina display product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2648.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standards TS 23.060 V6.4.0.

2649.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0.

2650.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0.

2651.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2652.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2653.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2654.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2655.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2656.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2657.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2658.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2659.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2660.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2661.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2662.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2663.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2664.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2665.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2666.   Plaintiff is informed and believes, and on such basis alleges, that the iPad mini product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2667.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standards TS 23.060 V6.4.0.

2668.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0.

2669.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0.

2670.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2671.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview
of radio interface."

2672.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary
Block Flow."

2673.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell
reselection."

2674.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF
establishment initiated by the mobile station on PCCCH."

2675.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of
the packet access procedure."

2676.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource
Reallocation for Uplink."

2677.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone
product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC
buffer."

2678.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2679.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2680.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2681.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2682.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2683.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2684.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2685.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2686.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standards TS 23.060 V6.4.0.

2687.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0.

2688.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0.

2689.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2690.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2691.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2692.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2693.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2694.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2695.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2696.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2697.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2698.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2699.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2700.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2701.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2702.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2703.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2704.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2705.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standards TS 23.060 V6.4.0.

2706.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0.

2707.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0.

2708.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2709.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2710.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2711.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2712.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2713.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2714.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2715.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2716.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2717.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2718.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2719.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2720.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2721.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2722.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2723.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-TRIGGER."

2724.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standards TS 23.060 V6.4.0.

2725. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0.

2726. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0.

2727. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2728. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2729. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2730. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2731. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2732. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2733.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2734.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2735.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2736.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2737.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2738.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2739.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2740.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2741.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined

Information (I) and Supervisory (S) frames."

2742.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-

TRIGGER."

2743.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standards TS 23.060 V6.4.0.

2744.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0.

2745.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0.

2746.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update

Procedure."

2747.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview

of radio interface."

2748.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary

Block Flow."

2749.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2750.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2751.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2752.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2753.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2754.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2755.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2756.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC

data block."

2757.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2758.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field

formats, parameters, and variables."

2759.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL

command."

2760.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined

Information (I) and Supervisory (S) frames."

2761.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-

TRIGGER."

2762.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standards TS 23.060 V6.4.0.

2763.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 44.060 V6.6.0.

2764.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 44.064 V6.0.0.

2765.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 23.060 V6.4.0, Section 6.9.1.1 titled "Cell Update Procedure."

2766.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 4 titled "Layered overview of radio interface."

2767.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.2.1 titled "Temporary Block Flow."

2768.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 5.5.1.1 titled "Cell reselection."

2769.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

2770.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

2771.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

2772.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.9.3 titled "RLC buffer."

2773.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

2774.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2 titled "GPRS RLC data blocks."

2775.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.060 V6.6.0, Section 10.2.2 titled "Uplink RLC data block."

2776.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 5.1 titled "General."

2777.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.3 titled "Control field formats, parameters, and variables."

2778.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.1.7 titled "NULL command."

2779.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5 product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 6.4.3 titled "Combined Information (I) and Supervisory (S) frames."

2780.   Plaintiff is informed and believes, and on such basis alleges, that the iPhone 5

product complies with the 3GPP Standard TS 44.064 V6.0.0, Section 7.2.1.3 titled "LLGMM-

TRIGGER."

2781.   Upon information and belief, Apple will continue to directly infringe, induce

infringement and/or contribute to the infringement of the '689 patent.

2782.   Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is

entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful

acts in an amount subject to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment and seeks relief against Apple as follows:

(a)   For judgment that the '277 patent has been and/or continues to be infringed by

Apple;

(b)   For judgment that the '347 patent has been and/or continues to be infringed by

Apple;

(c)   For judgment that the '181 patent has been and/or continues to be infringed by

Apple;

(d)   For judgment that the '959 patent has been and/or continues to be infringed by

Apple;

(e)   For judgment that the '271 patent has been and/or continues to be infringed by

Apple;

(f)   For judgment that the '321 patent has been and/or continues to be infringed by

Apple;

(g)   For judgment that the '143 patent has been and/or continues to be infringed by

Apple;

(h)   For judgment that the '850 patent has been and/or continues to be infringed by Apple;

(i)   For judgment that the '679 patent has been and/or continues to be infringed by Apple;

(j)   For judgment that the '045 patent has been and/or continues to be infringed by Apple;

(k)   For judgment that the '860 patent has been and/or continues to be infringed by Apple;

(l)   For judgment that the '022 patent has been and/or continues to be infringed by Apple;

(m)   For judgment that the '664 patent has been and/or continues to be infringed by Apple;

(n)   For judgment that the '689 patent has been and/or continues to be infringed by Apple;

(o)   For an accounting of all damages sustained by Plaintiff as the result of Apple's acts of infringement;

(p)   For enhanced damages pursuant to 35 U.S.C. § 284;

(q)   For a mandatory future royalty payable on each and every product sold by Apple in the future that is found to infringe one or more of the patents-in-suit and on all future products which are not colorably different from products found to infringe;

(r)   For an award of attorneys' fees pursuant to 35 U.S.C. § 285 or otherwise permitted by law;

(s)   For all costs of suit; and

(t)   For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and Local Rule CV-38, Plaintiff demands a trial by jury of this action.

Dated: November 12, 2012   Respectfully Submitted,

By: /s/ Henry Bunsow (w/permission Wesley Hill)
    Henry Bunsow (California State Bar # 60707)
    Denise M. De Mory (California State Bar #168076)
    Brian A.E. Smith (California State Bar # 188147)
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    **ATTORNEYS FOR PLAINTIFF
    CORE WIRELESS LICENSING S.A.R.L.**

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this the 12th day of November, 2012.

/s/ Wesley Hill
Wesley Hill