UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of CERTAIN ELECTRONIC DEVICES, INCLUDING MOBILE PHONES, MOBILE TABLETS, PORTABLE MUSIC PLAYERS, AND COMPUTERS, AND COMPONENTS THEREOF	Investigation No. 337-TA- _____

COMPLAINT UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

Complainants:

Nokia Corporation
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White Plains, NY 10604
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Intellisync Corporation
102 Corporate Park Drive
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Proposed Respondent:

Apple Inc.
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4.	Certified Copy of U.S. Patent No. 7,558,696
5.	Certified Copy of U.S. Patent No. 6,445,932
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I. INTRODUCTION

1. Complainants Nokia Corporation, Nokia Inc., and Intellisync Corporation (collectively "Nokia") file this Complaint under Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 ("Section 337"), based upon the unlawful importation into the United States, the sale for importation, and/or the sale within the United States after importation of certain electronic devices, including mobile phones, mobile tablets, portable music players, and computers, and components thereof.

2. The proposed respondent is Apple, Inc. ("Apple").

3. This Complaint is directed to Apple's imported electronic devices and components thereof, including all iPhones, iPod Touches, iPads, and iMac, Mac Mini, Mac Pro, MacBook, MacBook Pro, and MacBook Air computers (collectively the "Accused Products"[1]) that infringe claims 1-2, 5-6, and 9-14 of United States Patent No. 7,209,911 ("911 patent"); claims 1, 21, 25-27, and 51-52 of United States Patent No. 6,212,529 ("529 patent"); claims 3-4, 21, 26, 28, 38, 43-44, 61, 67-68, and 77-78 of United States Patent No. 6,141,664 ("664 patent"); claims 1, 3, 5, 9, 11-14, 16, 18-19, 21-23, and 25 of United States Patent No. 7,558,696 ("696 patent"); claims 1-3, 5, 9, and 15 of United States Patent No. 6,445,932 ("932 patent"); claims 1-2 and 5-6 of United States Patent No. 5,898,740 ("740 patent"); and/or claims 1-6, 8-15, and 21 of United States Patent No. 7,319,874 ("874 patent") (collectively the "Asserted Patents").

[1] The term "Accused Products" encompasses all of Apple's electronic devices and components thereof, including mobile phones, mobile tablets, portable music players, and computers with functionality that comes within the scope of the Asserted Patents' claims. Upon further investigation and discovery, Nokia may identify additional Accused Products and/or seek to assert additional claims of the Asserted Patents.

4. An industry as required by 19 U.S.C. §§ 1337(a)(2) and (3) exists or is in the process of being established in the United States relating to articles protected by the Asserted Patents.

5. Nokia seeks a permanent exclusion order prohibiting the entry of Apple's infringing electronic devices and components thereof into the United States. Nokia also requests a permanent cease and desist order prohibiting Apple from importing, admitting or withdrawing from a foreign trade zone, marketing, advertising, demonstrating, warehousing inventory for distribution, distributing, offering for sale, selling, licensing, repairing, maintaining, programming, updating, using, or transferring outside the United States for sale in the United States infringing electronic devices or components thereof.

II. THE COMPLAINANTS

A. Nokia Corporation

6. Nokia Corporation was founded in 1865 and is the world's largest manufacturer of mobile phones. Nokia is one of the champions of wireless communications and has received numerous awards and accolades for its achievements, including introducing the first car phone on the first international cellular mobile network in 1981.

7. Nokia's innovations have continued throughout the wireless era to the smartphones of the present day. In 1991, the world's first genuine call on the Global System for Mobile communications ("GSM") was made with a Nokia phone. In 1996, Nokia introduced the Nokia 9000 Communicator, which was the first all-in-one phone, fax, calendar, e-mail, and Internet device in a hand-portable size. The Nokia 8110i, introduced in 1997, was the first mobile phone with a dynamic menu supporting Smart Messaging. Just two years later, Nokia introduced the Nokia 7110 – the first mobile phone compliant with Wireless Application

Protocol 1.1 – which provided access to mobile Internet services, such as banking, e-mail, and news, and was the first phone with predictive text input.

8. In 2001, Nokia made the world's first 3G Universal Mobile Telecommunications System ("UMTS") voice call on a commercial system. In 2002, Nokia introduced the world's first UMTS/GSM dual mode phone and launched the Nokia 7650, its first imaging phone with an integrated camera and the first Nokia phone to record video simultaneously with sound. The Nokia 5140, launched in 2003, was the first Push-to-Talk GSM handset. In 2006, Nokia introduced the N95, which was the first such device with built-in Global Positioning System ("GPS") technology. In 2008, Nokia released the E71, the world's slimmest smartphone. Just last year, Nokia introduced the N8, the first smartphone with a built-in 720P High Definition video and a 12 megapixel camera.

9. Research is one of the keys to Nokia's success. As of December 2010, Nokia had a research and development presence in 16 countries and employed over 35,000 people in research and development alone. Through over 40 billion Euros in cumulative research and development investment, Nokia has achieved the innovations found in the Asserted Patents and in over 11,000 other patent families in its portfolio. Nokia continues to be a leader in mobile communications worldwide, investing nearly 6 billion Euros in 2010 for research and development.

B. Nokia Inc.

10. Nokia Inc. is a corporation existing under the laws of the State of Delaware with its principal place of business in White Plains, New York. Nokia Inc. is a wholly-owned subsidiary of Nokia Corporation.

11. Nokia Inc. currently employs nearly 3,000 people throughout the United States, including over 1,700 people who work in research and development in facilities across the United States.

12. Further information regarding Nokia Corporation and Nokia Inc. may be found in Exhibit 15, which includes Nokia Corporation's 2010 Form 20-F.

C. Intellisync Corporation

13. Intellisync Corporation is a corporation existing under the laws of the State of Delaware with its principal place of business in White Plains, New York. Intellisync Corporation is a wholly-owned subsidiary of Nokia Inc.

III. THE PROPOSED RESPONDENT APPLE INC.

14. Proposed Respondent Apple Inc. is a corporation existing under the laws of the State of California, with its principal place of business at 1 Infinite Loop, Cupertino, California 95014.

15. Apple is in the business of importing and selling electronic devices, including mobile phones, mobile tablets, portable music players, and computers.

16. Further information regarding Apple may be found in Exhibit 16, which includes Apple's 2010 Form 10-K.

IV. THE TECHNOLOGY AND PRODUCTS IN ISSUE

17. The Asserted Patents are a reflection of the breadth of Nokia's extensive dedication and investment in technology. Ever since Nokia's first car phone in 1981, Nokia has continuously endeavored to make the world's best mobile phones and enhance the user's experience with diverse and advanced functionality. Whether it is designing more reliable mobile phones that drop fewer calls, the first smartphones that synchronize seamlessly with computers, or some of the first mobile phones with built-in GPS, Nokia has taken great strides to

stay ahead of its competition. Nokia's innovations have been applied in many electronic devices other than mobile phones, such as mobile tablets, portable music players, and computers.

18. Mobile phones have come a long way since the car phones and briefcase phones of the 1980s. Today's mobile phones not only make phone calls; they do much more. The smartphones today are GPS devices, internet browsers, electronic mail devices, electronic book readers, social networking platforms, and so much more. Not only do smartphones have many functions, they also have many different antennas for connecting to more than simply a cellular network. Smartphones have Wi-Fi, GPS, and even Bluetooth antennas for connecting to wireless devices such as hands-free Bluetooth headsets.

19. With so many features, it is fair to say that today's smartphones are an extension of our desktop computers. Smartphones put critical information previously stored only on computers at our fingertips, like contacts, calendars, notes, and even music. In order to have this information on the go the mobile phone must be able to synchronize with a computer. As explained below, the 911, 529, and 664 patents relate to technology that allows high storage desktop computers to synchronize select types of information with mobile devices.

20. Today's electronic devices, including the iPhone and iPad, run a wide variety of applications that allow users to send emails, browse the Internet, play music, and even determine their precise location on the world's globe. Many, if not most, of the applications running on today's mobile electronic devices demand location data, such as popular iPhone applications Yelp, Foursquare, and Google Maps, to name only a few. The inventors of the 696 patent recognized early on that as more and more applications demand location data, smartphones would need a centralized management system to balance the applications' demands for location data with the phone's resources. Nokia's 696 patent provides this critical central management.

21. E-mail, text messaging, and other electronic communications have become a fundamental part of our lives, and Apple's computers, mobile phones, and even the iPod Touch portable music player now have applications for electronic messaging. Nokia has been an innovator in creating new and useful features for communicating electronically. Years before the iPhone, Nokia took this innovation and applied it to its first multi-tasking smartphones, the Communicators. Nokia recognized that draft data, such as draft electronic messages could be easily lost in the shuffle when devices were running multiple applications at the same time. The 932 patent solves this problem by automatically saving draft data based on certain events, such as exiting an application or taking an incoming phone call. These patented features have become a staple of Apple's new iPhones and a critical feature of today's multi-tasking mobile devices.

22. Even though mobile phones have evolved from a simple phone to a complex multi-service smartphone, the ability to make a clear call is still a fundamental part of any mobile phone. Nokia has long been an innovator in improving phone signal quality and minimizing dropped calls. The 740 patent introduces a patented technology that optimizes voice quality while reducing the number of dropped calls. This technology has become ubiquitous in today's mobile phone environment.

23. In addition to connecting to the cellular network to place phone calls, shorter range wireless connectivity has become a necessary feature of all current smartphones. Bluetooth is just one example. Bluetooth allows us to print wirelessly to a printer, share data between devices, and even use wireless devices such as a wireless mouse or keyboard. Apple incorporates this technology into many of its products, including the iPhone 4. Before this technology became popular, Nokia saw the potential to incorporate new wireless technologies with mobile phones such that users could simultaneously use a cellular network and a Bluetooth

network. The 874 patent introduces a way to simultaneously use Bluetooth while maintaining a connection to a cellular network. This patented technology is critical to any user who has ever used a wireless Bluetooth headset to carry on a call.

V. THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTIONS OF THE INVENTIONS THEREIN[2]

A. Ownership of the Asserted Patents

24. Intellisync Corporation owns by assignment the entire right, title, and interest in and to the 911, 529, and 664 patents. Nokia Corporation owns by assignment the entire right, title, and interest in and to the remaining Asserted Patents. Copies of the assignments for each of the Asserted Patents are attached as Exhibits 8-14.[3]

B. The 911, 529, and 664 Patents

25. U.S. Patent Nos. 7,209,911, 6,212,529, and 6,141,664 each claim priority directly or indirectly to the same parent application, United States Patent Application Serial No. 08/748,645, filed on November 13, 1996.

26. The 911 patent, entitled "Synchronization of Databases Using Filters," issued on April 24, 2007 to inventors David J. Boothby and David W. Morgan. The 911 patent issued from United States Patent Application Serial No. 09/776,452, filed on February 2, 2001. The 911 patent expires on November 13, 2016.

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[2] All non-technical descriptions of the inventions herein are presented to give a general background of those inventions. These statements are not intended to be used nor should they be used for purposes of patent claim interpretation. Complainants present these statements subject to and without waiver of their right to argue that claim terms should be construed in a particular way as contemplated by claim interpretation jurisprudence and the relevant evidence.

[3] Nokia has requested certified copies of each patent, assignment, and prosecution history from the United States Patent and Trademark Office. To the extent the copies attached to this complaint are uncertified, Nokia will provide certified copies as soon as they are available.

27. The 529 patent, entitled "Synchronization of Databases Using Filters," issued on April 3, 2001 to inventors David J. Boothby, David W. Morgan, and John R. Marien. The 529 patent issued from United States Patent Application Serial No. 09/036,400, filed on March 5, 1998. The 529 patent expires on November 13, 2016.

28. The 664 patent, entitled "Synchronization of Databases With Date Range," issued on October 31, 2000 to inventor David J. Boothby. The 664 patent issued from United States Patent Application Serial No. 08/748,645, filed on November 13, 1996. The 664 patent expires on November 13, 2016.

29. Copies of the 911, 529, and 664 patents are attached as Exhibits 1-3, respectively.

30. A copy of the prosecution history of the 911 patent and copies of each reference cited in the 911 patent and its prosecution history are included in Appendices A and B, respectively.

31. A copy of the prosecution history of the 529 patent and copies of each reference cited in the 529 patent and its prosecution history are included in Appendices C and D, respectively.

32. A copy of the prosecution history of the 664 patent and copies of each reference cited in the 664 patent and its prosecution history are included in Appendices E and F, respectively.

33. The 911 patent has 14 claims, 4 of which are independent claims. Complainants are asserting claims 1-2, 5-6, and 9-14.

34. The 529 patent, as amended by the ex parte reexamination certificate issued on October 11, 2005, has 18 claims, 2 of which are independent claims. Complainants are asserting claims 1, 21, 25-27, and 51-52.

35. The 664 patent, as amended by the ex parte reexamination certificate issued November 22, 2005, has 56 claims, 4 of which are independent claims. Complainants are asserting claims 3-4, 21, 26, 28, 38, 43-44, 61, 67-68, and 77-78.

36. Synchronizing mobile phones with personal computers has become almost second nature today. But before this was the case, the inventors of these patents helped develop the synchronization technology that allows two devices of extremely different storage capacity to sync with each other despite the huge storage disparity. The inventors came up with a filter that allows a large capacity computer to sync selected information with a much smaller mobile device. A high level overview of this filter is shown in Figure 16 below.

U.S. Pat. No. 7,209,911 - Figure 16

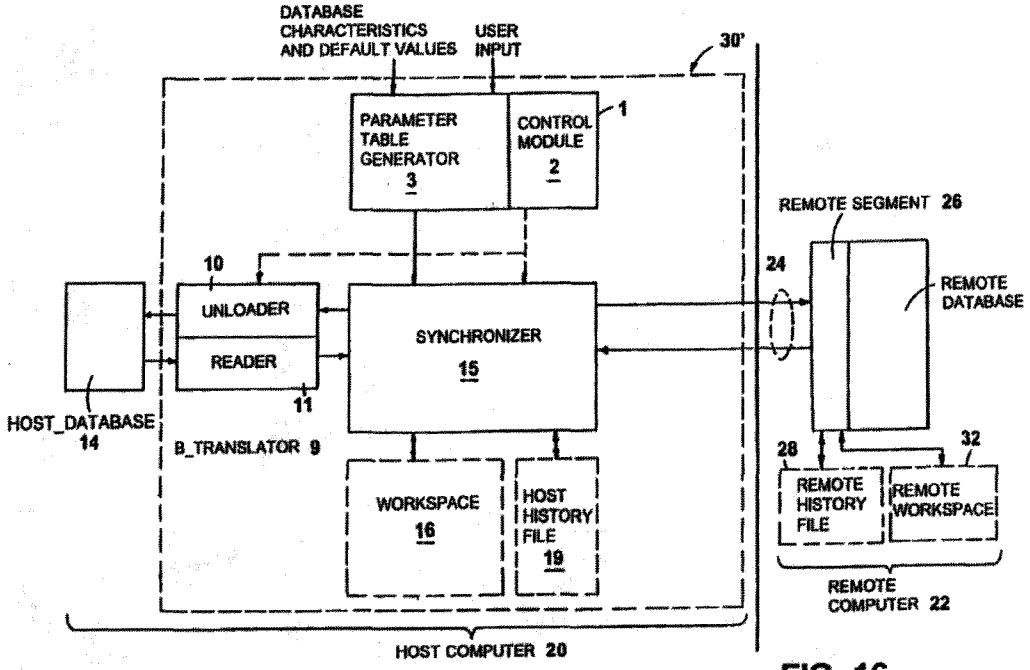


FIG. 16

C. The 696 Patent

37. U.S. Patent No. 7,558,696, entitled "Method and Device for Position Determination," issued on July 7, 2009 to inventors Matti Vilpulla, Arto Mattila, and Markku

Niemi. The 696 Patent issued from United States Patent Application Serial No. 09/897,004, filed on July 2, 2001. The 696 patent expires on January 16, 2024.

38. A certified copy of the 696 patent is attached as Exhibit 4.

39. A certified copy of the prosecution history of the 696 patent and copies of each reference cited in the 696 patent and its prosecution history are included in Appendices G and H, respectively.

40. The 696 patent has 31 claims, 12 of which are independent claims. Complainants are asserting claims 1, 3, 5, 9, 11-14, 16, 18-19, 21-23, and 25.

41. The 696 patent relates to providing a centralized interface for applications running on a mobile device to obtain position data. The 696 patent allows application developers, for example, to make use of existing positioning capabilities without having to write as much code for their applications. The availability of applications with positioning capability, as allowed by the 696 patent, provides for a better user experience.

42. In one embodiment, the 696 patent provides a position method selection device, or "PMSD," that serves as an interface between the application level and at least one positioning method on the mobile device. Figure 1 of the 696 patent shows one embodiment of the invention using a PMSD:

U.S. Pat. No. 7,558,696 - Figure 1

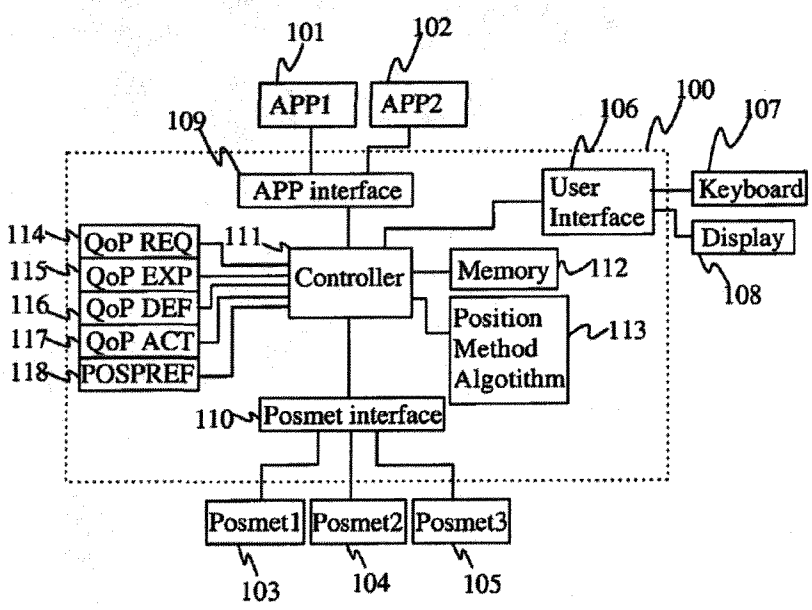


Fig. 1

D. The 932 Patent

43. U.S. Patent No. 6,445,932, entitled "Multi-Service Mobile Station," issued on Sep. 3, 2002 to inventors Veli-Matti Soini, Markku Rautiola, Jarmo J. Makela, Toni Sormunen, Harri Halminen, and Jari Toivanen. The 932 patent issued from United States Patent Application Serial No. 08/802,715, filed on February 19, 1997. The 932 patent expires on February 19, 2017.

44. A certified copy of the 932 patent is attached as Exhibit 5.

45. A copy of the prosecution history of the 932 patent and copies of each reference cited in the 932 patent and its prosecution history are included in Appendices I and J, respectively.

46. The 932 patent has 18 claims, 4 of which are independent claims. Complainants are asserting claims 1-3, 5, 9, and 15.

47. Today's smartphones have come a long way from their traditional single purpose predecessors of the 1980's and 90's. One of the recent advancements has been the ability to multi-task, or operate multiple applications at the same time. When multi-tasking with a mobile phone, it is critical that draft information entered while in one application is not lost when that application is interrupted either because it is closed, navigated away from, or suspended by an incoming phone call.

48. The inventors of the 932 patent were ahead of their time in 1996 when they recognized the need for "smart" mobile phones operating more than one application to automatically save draft information, such as a draft email message, upon certain events, such as turning off a phone.

49. The 932 invention automatically stores draft information entered by a user, as well as information related to that application, to non-volatile memory upon certain events, such as exiting or navigating away from the current application. The user is then able to pick up where they left off even if they forgot to save the draft data. A high level example of a mobile device configuration of the type described in the 932 patent is shown below.

U.S. Pat. No. 6,445,932 - Figure 4

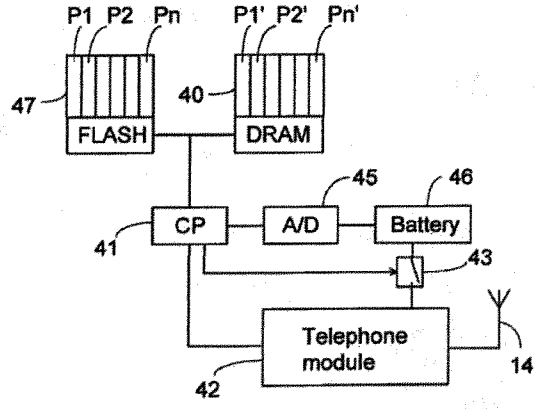


Figure 4

E. The 740 Patent

50. U.S. Patent No. 5,898,740, entitled "Power Control Method in a Cellular Communication System and a Receiver," issued on April 27, 1999 to inventors Timo Laakso and Hannu Hakkinen. The 740 patent issued from United States Patent Application Serial No. 08/793,259, which is a national stage application of PCT/FI95/00450 filed on August 23, 1995. The 740 patent expires on August 23, 2015.

51. A copy of the 740 patent is attached as Exhibit 6.

52. A copy of the prosecution history of the 740 patent and copies of each reference cited in the 740 patent and its prosecution history are included in Appendices K and L.

53. The 740 patent has 11 claims, 6 of which are independent claims. Complainants are asserting claims 1, 2, and 5-6.

54. Mobile phone users share a communications network with many other users. The signals used to transfer data to and from these phones all overlap and create interference in the network. If there is too much noise in the network, the quality of calls suffer and calls are more likely to be dropped as more users enter the network, as in an urban area.

55. Early mobile phones attempted to reduce these problems either by using interference cancellation, which reduces the amount of noise in an individual user's call, or by using power control, which decreases the power used to transmit signals and therefore allows more users to be on the network without dropping their calls. These were always used as separate solutions, without taking into account the effect one would have on the other The inventors of the 740 patent invented a way to use power control, while accounting for the effects of interference cancellation, to achieve better voice quality with fewer dropped calls.

U.S. Pat. No. 5,898,740 - Figure 2

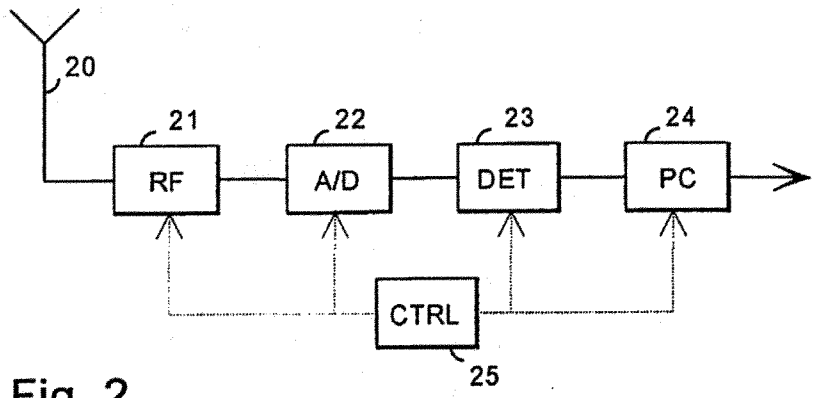


Fig. 2

56. As shown in Figure 2 of the 740 patent above, a receiver comprising an antenna (reference numeral 20) receives an analog signal and converts it to a digital signal using a converter (reference numeral 22). Interference cancellation takes place in a detector (reference numeral 23) that also measures parameters needed to perform power control after the interference cancellation has taken place. Power control (reference numeral 24) of the transmitter is performed after this interference cancellation and measurement have taken place.

F. The 874 Patent

57. U.S. Patent No. 7,319,874, entitled "Dual Mode Terminal for Accessing a Cellular Network Directly or via a Wireless Internet," issued on Jan. 15, 2008 to inventors Markku Rautiola, Jussi Lemilainen, and Markku Niemi. The 874 patent issued from United States Patent Application Serial No. 10/941,915, filed on September 16, 2004, which is a continuation of United States Patent Application Serial No. 09/646,419, which is a national stage application of PCT/IB99/0055 filed on March 18, 1999. The 874 patent expires on March 18, 2019, plus a patent term extension of 115 days, and is subject to a terminal disclaimer.

58. A copy of the 874 patent is attached as Exhibit 7.

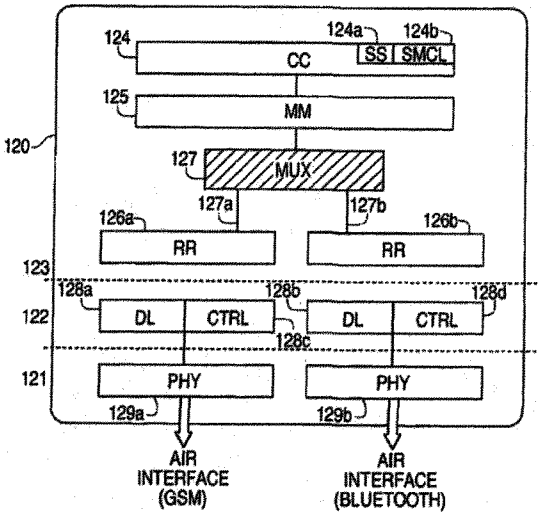
59. A copy of the prosecution history of the 874 patent and copies of each reference cited in the 874 patent and its prosecution history are included in Appendices M and N, respectively.

60. The 874 patent has 21 claims, 4 of which are independent claims. Complainants are asserting claims 1-6, 8-15, and 21.

61. As mobile phones developed and wireless networks began to become available, the inventors of the 874 patent recognized the need to interface these two technologies in a single device that would enable users to simultaneously use both networks.

U.S. Pat. No. 7,319,874 - Figure 12

FIG. 12



62. To do this, the inventors devised a novel arrangement of interfaces (as depicted in Fig. 12 of the 874 patent, above) that allows links to two different network interfaces in a device that can operate independently of which network is being used. This meant that users could use a wireless network, such as Bluetooth, while simultaneously staying connected to a cellular network. This invention allows a cell phone to simultaneously communicate with, for example,

a wireless headset and a cellular network such that hands-free operation of cell phones is possible

G. Foreign Counterparts of the Asserted Patents

63. A list of each foreign patent, each foreign patent application (not already issued as a patent), and each foreign patent application that has been denied, abandoned, or withdrawn corresponding to the Asserted Patents, with an indication of the prosecution status of each such foreign patent application, is attached as Exhibit 17. No other foreign patents or patent applications corresponding to any of the Asserted Patents have been filed, abandoned, withdrawn, or rejected.

H. Licensees Under the Asserted Patents

64. Licensees to one or more of the Asserted Patents are identified in Confidential Exhibit 54.

VI. APPLE'S INFRINGEMENT OF THE ASSERTED PATENTS

65. As discussed in detail below, at least the Accused Products infringe the 911, 529, 664, 696, 932, 740, and/or 874 patents. Information regarding representative Accused Products discussed below may be found in Exhibits 18-23. The identification of a specific model or type of electronic device is not intended to limit the scope of the Investigation, and any remedy should extend to all infringing electronic devices.

A. Apple's Infringement of the 911 Patent

66. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 1-2, 5-6, and 9-14 of the 911 patent with at least the following electronic devices: all Apple iPhones for the AT&T network, all iPads and iPod Touches, and all Mac, MacBook, MacBook Pro, and MacBook Air computers (collectively, the "911 Accused Devices").

67. An exemplary claim chart showing infringement of independent claims 1, 2, 5, and 6 of the 911 patent by the iPhone 4 mobile phone for the AT&T network is attached as Exhibit 24.

1. Direct Infringement

68. Apple, directly and through authorized agents, sells and offers for sale the 911 Accused Devices within the United States. The 911 Accused Devices have been purchased in the United States directly from Apple. *See* Exhibit 31.

69. On information and belief, Apple sells and offers for sale the 911 Accused Devices to wireless system operators, distributors, independent retailers, and consumers in the United States.

70. On information and belief, Apple imports into the United States at least the 911 Accused Devices.

71. On information and belief, Apple tests or operates the 911 Accused Devices in the United States, thereby performing the claimed methods and directly infringing any asserted claims of the 911 patent requiring such operation.

72. Therefore, Apple directly infringes at least claims 1-2, 5-6, and 9-14 of the 911 patent through its importation for sale, sale after importation, and/or use after importation of certain electronic devices.

2. Contributory Infringement

73. Apple also contributes to infringement of (and thereby infringes) at least claims 1-2, 5-6, and 9-14 of the 911 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 911 Accused Devices, and the non-staple constituent parts of those devices, that embody a material part of the inventions described in the 911 patent. These devices are known by Apple to

be especially made or especially adapted for use in infringement of the 911 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

74. Specifically, Apple sells the 911 Accused Devices, with knowledge that the devices infringe, through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 911 patent.

75. Nokia put Apple on notice of the 911 patent and Apple's infringement thereof at least as early as the service of this Complaint.

3. Inducement of Infringement

76. Apple has also induced and continues to induce others to infringe claims 1-2, 5-6, and 9-14 of the 911 patent in violation of 35 U.S.C. § 271 by encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 911 patent with intent that those performing the acts infringe the 911 patent. Apple, upon information and belief, *inter alia*, advertises regarding the 911 Accused Devices, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 911 Accused Devices, and offers support and technical assistance to its customers.

B. Apple's Infringement of the 529 Patent

77. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 1, 21, 25-27, and 51-52 of the 529 patent with at least the following electronic devices: all Apple iPhones for the AT&T network, all iPads and iPod Touches, and all Mac, MacBook, MacBook Pro, and MacBook Air computers (collectively, the "529 Accused Devices").

78. An exemplary claim chart showing infringement of independent claims 1 and 27 of the 529 patent by the iPhone 4 mobile phone for the AT&T network is attached as Exhibit 25.

1. Direct Infringement

79. Apple, directly and through authorized agents, sells and offers for sale the 529 Accused Devices within the United States. The 529 Accused Devices have been purchased in the United States directly from Apple. *See* Exhibit 31.

80. On information and belief, Apple sells and offers for sale the 529 Accused Devices to wireless system operators, distributors, and independent retailers in the United States.

81. On information and belief, Apple imports into the United States at least the 529 Accused Devices.

82. Therefore, Apple directly infringes at least claims 1, 21, 25-27, and 51-52 of the 529 patent through its importation for sale and/or sale after importation of certain electronic devices.

2. Contributory Infringement

83. Apple also contributes to infringement of (and thereby infringes) at least claims 1, 21, 25-27, and 51-52 of the 529 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 529 Accused Devices, and the non-staple constituent parts of those devices that embody a material part of the inventions described in the 529 patent. These devices are known by Apple to be especially made or especially adapted for use in infringement of the 529 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

84. Specifically, Apple sells the 529 Accused Devices, with knowledge that the devices infringe, through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 529 patent.

85. Nokia put Apple on notice of the 529 patent and Apple's infringement thereof at least as early as the service of this Complaint.

3. Inducement of Infringement

86. Apple has also induced and continues to induce others to infringe claims 1, 21, 25-27, and 51-52 of the 529 patent in violation of 35 U.S.C. § 271 by encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 529 patent with intent that those performing the acts infringe the 529 patent. Apple, upon information and belief, *inter alia*, advertises regarding the 529 Accused Devices, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 529 Accused Devices, and offers support and technical assistance to its customers.

C. Apple's Infringement of the 664 Patent

87. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 3-4, 21, 26, 28, 38, 43-44, 61, 67-68, and 77-78 of the 664 patent with at least the following electronic devices: all Apple iPhones for the AT&T network, all iPads and iPod Touches, and all Mac, MacBook, MacBook Pro, and MacBook Air computers (collectively, the "664 Accused Devices").

88. An exemplary claim chart showing infringement of independent claims 3, 28, 43, and 68 of the 664 patent by the iPhone 4 mobile phone for the AT&T network is attached as Exhibit 26.

1. Direct Infringement

89. Apple, directly and through authorized agents, sells and offers for sale the 664 Accused Devices within the United States. The 664 Accused Devices have been purchased in the United States directly from Apple. *See* Exhibit 31.

90. On information and belief, Apple sells and offers for sale the 664 Accused Devices to wireless system operators, distributors, independent retailers, and consumers in the United States.

91. On information and belief, Apple imports into the United States at least the 664 Accused Devices.

92. Therefore, Apple directly infringes at least claims 3-4, 21, 26, 28, 38, 43-44, 61, 67-68, and 77-78 of the 664 patent through its importation for sale and/or sale after importation of certain electronic devices.

2. Contributory Infringement

93. Apple also contributes to infringement of (and thereby infringes) at least claims 3-4, 21, 26, 28, 38, 43-44, 61, 67-68, and 77-78 of the 664 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 664 Accused Devices, and the non-staple constituent parts of those devices that embody a material part of the inventions described in the 664 patent. These devices are known by Apple to be especially made or especially adapted for use in infringement of the 664 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

94. Specifically, Apple sells the 664 Accused Devices, with knowledge that the devices infringe, through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 664 patent.

95. Nokia put Apple on notice of the 664 patent and Apple's infringement thereof at least as early as the service of this Complaint.

3. Inducement of Infringement

96. Apple has also induced, and continues to induce others to infringe claims 3-4, 21, 26, 28, 38, 43-44, 61, 67-68, and 77-78 of the 664 patent in violation of 35 U.S.C. § 271, by

encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 664 patent with intent that those performing the acts infringe the 664 patent. Apple, upon information and belief, *inter alia*, advertises regarding the 664 Accused Devices, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 664 Accused Devices, and offers support and technical assistance to its customers.

D. Apple's Infringement of the 696 Patent

97. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 1, 3, 5, 9, 11-14, 16, 18-19, 21-23, and 25 of the 696 patent with at least the following electronic devices: all Apple iPhones for the AT&T network, all iPads and iPod Touches, and all MacBook, MacBook Pro, and MacBook Air computers (collectively, the "696 Accused Devices").

98. An exemplary claim chart showing infringement of independent claims 1, 3, 5, 9, 11, 13, 18, 21, and 25 of the 696 patent by the iPhone 4 mobile phone for the AT&T network is attached as Confidential Exhibit 27.

1. Direct Infringement

99. Apple, directly and through authorized agents, sells and offers for sale the 696 Accused Devices within the United States. The 696 Accused Devices have been purchased in the United States directly from Apple. *See* Exhibit 31.

100. On information and belief, Apple sells and offers for sale the 696 Accused Devices to wireless system operators, distributors, independent retailers, and consumers in the United States.

101. On information and belief, Apple imports into the United States at least the 696 Accused Devices.

102. On information and belief, Apple tests or operates the 696 Accused Devices in the United States, thereby performing the claimed methods and directly infringing any asserted claims of the 696 patent requiring such operation.

103. Apple therefore directly infringes at least claims 1, 3, 5, 9, 11-14, 16, 18-19, 21-23, and 25 of the 696 patent through its importation for sale, sale after importation, and/or use after importation of certain electronic devices.

2. Contributory Infringement

104. Apple also contributes to infringement of (and thereby infringes) at least claims 1, 3, 5, 9, 11-14, 16, 18-19, 21-23, and 25 of the 696 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 696 Accused Devices, and the non-staple constituent parts of those devices that embody a material part of the inventions described in the 696 patent. These devices are known by Apple to be especially made or especially adapted for use in infringement of the 696 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

105. Specifically, Apple sells the 696 Accused Devices with knowledge that the devices infringe through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 696 patent.

106. Apple has been on notice of the 696 patent and Apple's infringement since at least as early as May 7, 2010, the date on which Apple was served with a Complaint and Summons alleging Apple's infringement of the 696 patent in Civil Action No. 3:10-cv-00249-wmc in the United States District Court for the Western District of Wisconsin.

3. Inducement of Infringement

107. Apple also has induced, and continues to induce others to infringe claims 1, 3, 5, 9, 11-14, 16, 18-19, 21-23, and 25 of the 696 patent in violation of 35 U.S.C. § 271 by

encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 696 patent with intent that those performing the acts infringe the 696 patent. Apple, upon information and belief, *inter alia*, advertises regarding the 696 Accused Devices, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 696 Accused Devices, and offers support and technical assistance to its customers.

E. Apple's Infringement of the 932 Patent

108. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 1-3, 5, 9, and 15 of the 932 patent with at least the following electronic devices: all Apple iPhones for the AT&T network and all iPads and iPod Touches (collectively, the "932 Accused Devices").

109. An exemplary claim chart showing infringement of independent claims 1 and 15 of the 932 patent by the iPhone 4 mobile phone for the AT&T network is attached as Confidential Exhibit 28.

1. Direct Infringement

110. Apple, directly and through authorized agents, sells and offers for sale the 932 Accused Devices within the United States. The 932 Accused Devices have been purchased in the United States directly from Apple. *See* Exhibit 31.

111. On information and belief, Apple sells and offers for sale the 932 Accused Devices to wireless system operators, distributors, independent retailers, and consumers in the United States.

112. On information and belief, Apple imports into the United States at least the 932 Accused Devices.

113. Therefore, Apple directly infringes at least claims 1-3, 5, 9, and 15 of the 932 patent through its importation for sale and/or sale after importation of certain electronic devices.

2. Contributory Infringement

114. Apple also contributes to infringement of (and thereby infringes) at least claims 1-3, 5, 9, and 15 of the 932 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 932 Accused Devices, and the non-staple constituent parts of those devices that embody a material part of the inventions described in the 932 patent. These devices are known by Apple to be especially made or especially adapted for use in infringement of the 932 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

115. Specifically, Apple sells the 932 Accused Devices, with knowledge that the devices infringe, through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 932 patent.

116. Nokia put Apple on notice of the 932 patent and Apple's infringement thereof at least as early as the service of this Complaint.

3. Inducement of Infringement

117. Apple has also induced, and continues to induce others to infringe claims 1-3, 5, 9, and 15 of the 932 patent in violation of 35 U.S.C. § 271, by encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 932 patent with intent that those performing the acts infringe the 932 patent. Apple, upon information and belief, *inter alia*, advertises regarding the 932 Accused Devices, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 932 Accused Devices, and offers support and technical assistance to its customers.

F. Apple's Infringement of the 740 Patent

118. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 1-2 and 5-6 of the 740 patent with at least the following electronic device: iPhone 4 for the Verizon network (the "740 Accused Device").

119. An exemplary claim chart showing infringement of independent claim 1 of the 740 patent by the iPhone 4 for the Verizon network is attached as Confidential Exhibit 29.

1. Direct Infringement

120. Apple, directly and through authorized agents, sells and offers for sale the 740 Accused Device within the United States. The 740 Accused Device has been purchased in the United States directly from Apple. *See* Exhibit 31.

121. On information and belief, Apple sells and offers for sale the 740 Accused Device to distributors, independent retailers, and consumers in the United States.

122. On information and belief, Apple imports into the United States at least the 740 Accused Device.

123. Therefore, Apple directly infringes at least claims 1-2 and 5-6 of the 740 patent through its importation for sale and/or sale after importation of certain electronic devices.

2. Contributory Infringement

124. Apple also contributes to infringement of (and thereby infringes) at least claims 1-2 and 5-6 of the 740 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 740 Accused Device, and the non-staple constituent parts of those devices that embody a material part of the inventions described in the 740 patent. These devices are known by Apple to be especially made or especially adapted for use in infringement of the 740 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

125. Specifically, Apple sells the 740 Accused Device, with knowledge that the devices infringe, through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 740 patent.

126. Nokia put Apple on notice of the 740 patent and Apple's infringement thereof at least as early as the service of this Complaint.

3. Inducement of Infringement

127. Apple has also induced, and continues to induce others to infringe claims 1-2 and 5-6 of the 740 patent in violation of 35 U.S.C. § 271, by encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 740 patent with intent that those performing the acts infringe the 740 patent. Apple, upon information and belief, *inter alia*, advertises regarding the 740 Accused Device, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 740 Accused Device, and offers support and technical assistance to its customers.

G. Apple's Infringement of the 874 Patent

128. Apple directly infringes, contributes to infringement, and induces infringement with respect to at least claims 1-6, 8-15, and 21 of the 874 patent with at least the following electronic device: iPhone 4 for the Verizon network (the "874 Accused Device").

129. An exemplary claim chart showing infringement of independent claims 1, 11, and 21 of the 874 patent by the iPhone 4 for the Verizon network is attached as Confidential Exhibit 30.

1. Direct Infringement

130. Apple, directly and through authorized agents, sells and offers for sale the 874 Accused Device within the United States. The 874 Accused Device has been purchased in the United States directly from Apple. *See* Exhibit 31.

131. On information and belief, Apple sells and offers for sale the 874 Accused Device to distributors, independent retailers, and consumers in the United States.

132. On information and belief, Apple imports into the United States at least the 874 Accused Device.

133. Therefore, Apple directly infringes at least claims 1-6, 8-15, and 21 of the 874 patent through its importation for sale and/or sale after importation of certain electronic devices.

2. Contributory Infringement

134. Apple also contributes to infringement of (and thereby infringes) at least claims 1-6, 8-15, and 21 of the 874 patent in violation of 35 U.S.C. § 271 by selling within the United States, offering for sale within the United States, and/or importing components, including the 874 Accused Device, and the non-staple constituent parts of those devices that embody a material part of the inventions described in the 874 patent. These devices are known by Apple to be especially made or especially adapted for use in infringement of the 874 patent and are not staple articles or commodities suitable for substantial, non-infringing use.

135. Specifically, Apple sells the 874 Accused Device, with knowledge that the devices infringe, through wholesale channels to resellers and directly to consumers. Consumers of those electronic devices directly infringe the 874 patent.

136. Nokia put Apple on notice of the 874 patent and Apple's infringement thereof at least as early as the service of this Complaint.

3. Inducement of Infringement

137. Apple has also induced, and continues to induce others to infringe at least claims 1-6, 8-15, and 21 of the 874 patent in violation of 35 U.S.C. § 271, by encouraging and facilitating others to perform actions known by Apple to be acts of infringement of the 874 patent with intent that those performing the acts infringe the 874 patent. Apple, upon

information and belief, *inter alia*, advertises regarding the 874 Accused Device, publishes datasheets and promotional literature describing the operation of those devices, creates and/or distributes user manuals for the 874 Accused Device, and offers support and technical assistance to its customers.

VII. APPLE'S UNFAIR TRADE PRACTICES

138. On information and belief, Apple sells for importation, imports, and/or sells after importation its infringing electronic devices. For example, Apple's Accused Products were purchased from Apple in the United States. *See* Exhibit 31.

139. On information and belief, Apple's Accused Products are manufactured abroad, sold for importation, imported and sold after importation in the United States by Apple or Apple's vendors. For example, Exhibit 16 contains Apple's 10-K for the fiscal year ending September 25, 2010. The 10-K indicates that third party vendors in China perform final assembly of substantially all of Apple's Macs, iPhones, iPads and iPods. *See* Exhibit 16 at 8-9. The 10-K also indicates that 44% of Apple's net sales in 2010 were in the United States. *Id* at 9.

140. Exhibit 32 contains photographs of the iPhone mobile phones purchased from Apple in the United States showing that their packaging indicates that they were assembled in China.

141. Exhibit 33 contains photographs of the iPod Touch portable music player purchased from Apple in the United States showing that its packaging indicates that it was assembled in China.

142. Exhibit 34 contains photographs of the iPad mobile tablet purchased from Apple in the United States showing that its packaging indicates that it was assembled in China.

143. Exhibit 35 contains photographs of the Apple MacBook and Apple iMac computers purchased from Apple in the United States showing that their packaging indicates that they were assembled in China.

VIII. TARIFF NUMBERS APPLICABLE TO THE ACCUSED PRODUCTS

144. On information and belief, the Accused Products have been imported into the United States under at least Harmonized Tariff Schedule of the United States item numbers 8517.12.00 (mobile phones); 8519.81.40, 8521.90.00, or 8528.59.15 (portable music players); and 8471.30.01, 8471.49.00, or 8471.50.01 (mobile tablets and computers).

IX. RELATED LITIGATION

145. On May 7, 2010, Nokia Corporation filed a civil action in the United States District Court for the Western District of Wisconsin alleging, *inter alia,* that Apple infringed the 696 patent, Civ. Action No. 3:10-cv-00249-wmc. On January 5, 2011, that action was transferred to the United States District Court for the District of Delaware, where it remains pending, Civ. Action No. 11-15-GMS. Concurrent with the filing of this complaint, Nokia Corporation will file a civil action in the United States District Court for the District of Delaware accusing Apple of infringement of the remaining Asserted Patents. There has been no other foreign or domestic court or agency litigation relating to the unfair acts alleged herein.

X. THE DOMESTIC INDUSTRY

146. An industry as required by Section 337(a)(2) and defined by Section 337(a)(3) exists in the United States or is in the process of being established relating to Nokia's mobile phones protected by the Asserted Patents.

A. Nokia's Articles Protected by the Asserted Patents

147. Many of Nokia's mobile phones practice or have practiced the Asserted Patents. Nokia is constantly developing new and improved products and solutions to enhance the user's

mobile experience. *See* Confidential Exhibit 55. For purposes of outlining Nokia's satisfaction of the domestic industry requirement, Nokia has selected a current representative Nokia mobile phone, the Nokia N8, and a future Nokia mobile phone under development in its San Diego research and development facility ("Nokia's future mobile phone")[4] to demonstrate both a current domestic industry and one in the process of being established.

148. Photographs of the Nokia N8 are included in Exhibit 36. Exhibits 37 and Confidential Exhibit 38 contain technical information regarding the Nokia N8 mobile phone.

149. Exhibit 41 contains information regarding the Ovi Suite software.

150. Confidential Exhibit 47 contains a claim chart showing that the Nokia N8 mobile phone and Ovi Suite software practice at least claim 1 of the 911 patent.

151. Confidential Exhibit 48 contains a claim chart showing that the Nokia N8 mobile phone and Ovi Suite software practice at least claim 1 of the 529 patent.

152. Confidential Exhibit 49 contains a claim chart showing that the Nokia N8 mobile phone and Ovi Suite software practice at least claim 28 of the 664 patent.

153. Exhibit 39 and Confidential Exhibit 40 contain technical information regarding location services functionality found within the Nokia N8 mobile phone.

154. Exhibit 50 contains a claim chart showing that the Nokia N8 mobile phone practices at least claim 1 of the 696 patent.

155. Confidential Exhibit 51 contains a claim chart showing that the Nokia N8 mobile phone practices at least claim 1 of the 932 patent.

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[4] Nokia's 2705 and 7705 mobile phones, which were sold in 2010 and are similar in certain relevant respects to Nokia's future mobile phone, were also developed in San Diego. *See* Confidential Exhibits 46 and 52.

156. Exhibit 42 contains technical information regarding Qualcomm's interference cancellation.

157. CONFIDENTIAL Exhibit 43 contains technical information regarding Nokia's future mobile phone.

158. Exhibit 44 contains information regarding the CDMA2000 standard.

159. Confidential Exhibit 52 contains a claim chart showing that Nokia's future mobile phone will practice at least claim 1 of the 740 patent.[5]

160. Exhibit 45 contains information regarding Bluetooth functionality found within the Nokia N8 mobile phone.

161. Confidential Exhibit 53 contains a claim chart showing that the Nokia N8 mobile phones practice at least claim 11 of the 874 patent.

B. Nokia's Investments in the United States with respect to the Articles Protected by the Asserted Patents

162. Nokia has made and continues to make substantial investments in the United States in the exploitation of the Asserted Patents. These investments include at least domestic engineering, research and development, and testing relating to articles protected by the Asserted Patents. As detailed in Confidential Exhibit 55, over 1,700 employees located in fourteen Nokia facilities across the United States are involved in engineering and research and development at an annual cost of over $500 million. For purposes of outlining its satisfaction of the economic prong of the domestic industry requirement, Nokia has selected the following discrete domestic investments relating to the Nokia mobile phones described above that are protected by the Asserted Patents.

[5] This analysis is also applicable to Nokia's 2705 and 7705 mobile phones.

1. Investments Relating to Engineering and Research and Development

163. During the second half of 2010, Nokia introduced a family of smartphones based on its new Symbian^3 operating system, which is designed to offer an improved user experience. *See* Exhibit 15 at 45. In addition to adding more than 250 new features and improvements, these new smartphones offer a better platform for applications developers. *See id.* at 45-46. The Nokia N8 mobile phone is Nokia's flagship device for the Symbian^3 operating system and the first mobile phone running that software to be offered for sale in the United States. The Nokia N8 mobile phone offers enhanced user experience, including industry-leading imaging, video and entertainment capabilities. *See* Exhibit 15 at 45.

164. The state of the art web browser included on the Nokia N8 mobile phone, which renders the page equivalent to how a desktop browser would look and allows a user to interact with that page and the applications that run on that page, was developed in Nokia's Burlington, Massachusetts facility. Accessing the Internet and world wide web is an integral part of the user experience in the Nokia N8. Nokia's domestic investments in software engineering relating to web browser and applications development for the N8 mobile phone are detailed in Confidential Exhibit 56.

165. The Nokia N8 mobile phone also features sophisticated mapping and traffic functionality enabled by Nokia's U.S. subsidiary, NAVTEQ. In 2010, NAVTEQ employed over 2,000 people in the United States, primarily in Chicago, Illinois, Fargo, North Dakota and Malvern, Pennsylvania. Nokia's domestic investments in research and development significantly enhances the user experience on the Nokia N8, and are detailed in Confidential Exhibit 57.

166. The Nokia N8 mobile phone offers a variety of features and services to enhance user experience, including email, instant messenger/chat, and social client applications. Nokia employees in Alpharetta, Georgia, Austin, Texas, Boston, Massachusetts, Burlington,

Massachusetts, Dallas, Texas, Mountain View, California, and Parsippany, New Jersey developed these features and services in conjunction with domestic third party developers. Nokia's domestic investments in the engineering, research and development of these features and services are detailed in Confidential Exhibit 58.

167. Another enhancement to the N8 mobile phone is its ability to synchronize email, contacts and calendar through Nokia's Mail for Exchange and ActiveSync programs. These features are integral to the N8 mobile phone. These programs were developed by Nokia employees and contractors in Dallas, Texas and Sunnyvale, California. Nokia's domestic investments in the engineering, research and development of these programs are detailed in Confidential Exhibit 59.

168. The Nokia N8 mobile phone's multimedia features and services, including a music application, hi-definition video player, and HDMI output, which allows users to directly connect the N8 mobile phone to the televisions for video playback, were developed by Nokia employees in its Irving, Texas facility. This research and development work was vital to the development of the Nokia N8 mobile phone as a whole. Nokia's domestic investments in the engineering, research and development of these multimedia and display features are detailed in Confidential Exhibit 60.

169. Employees in Nokia's San Diego, California facility are presently designing and developing new mobile phone models, including Nokia's future mobile phone. Nokia employees at this facility also developed Nokia's 2705 and 7705 mobile phone models that were sold in 2010. Nokia's domestic investments in employees and plant and equipment to support the development of Nokia's future model and Nokia's 2705 and 7705 mobile phones are detailed in Confidential Exhibits 61 and 62.

2. Investments Relating to Testing

170. In order to support its products and customers, Nokia has made and continues to make substantial investments in the United States to test its mobile phones that practice the Asserted Patents.

171. Each Nokia phone model produced for the United States market undergoes rigorous testing in the United States by Nokia engineers or third party contractors under their direction. Nokia employees in Nokia's San Diego and Irving facilities are responsible for a wide variety of testing, including environmental testing, mechanical testing, failure analysis testing, and laboratory testing. In addition, Nokia employees or third party contractors field test each Nokia phone model at multiple locations throughout the United States. Nokia's domestic investments in testing the Nokia N8 mobile phone are described in more detail in Confidential Exhibit 63.

XI. COMPLAINANTS' REQUEST FOR RELIEF

172. Complainants Nokia Corporation, Nokia Inc., and Intellisync Corporation respectfully request that the United States International Trade Commission:

(a) Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to violations of Section 337 based upon the importation into the United States, the sale for importation, and/or the sale within the United States after importation of Apple's electronic devices and components thereof that infringe one or more claims of the Asserted Patents;

(b) Determine that there has been a violation of Section 337 by Apple;

(c) Issue a permanent exclusion order, pursuant to 19 U.S.C. § 1337(d)(1), prohibiting entry into the United States or admission into Foreign Trade Zones in

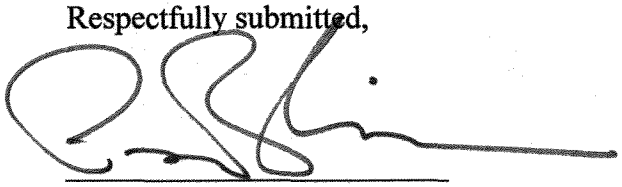
the United States of all of Apple's electronic devices and components thereof that infringe one or more claims of the Asserted Patents;

(d) Issue a permanent cease and desist order, pursuant to 19 U.S.C. § 1337(f), prohibiting Apple, its affiliates, and others acting on behalf of Apple, from importing, admitting, or withdrawing from a foreign trade zone, marketing, advertising, demonstrating, warehousing inventory for distribution, distributing, offering for sale, selling, licensing, repairing, maintaining, programming, updating, using, or transferring outside the United States for sale in the United States any of Apple's electronic devices and components thereof that infringe one or more claims of the Asserted Patents; and

(e) Issue such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

DATED: March 28, 2011

Respectfully submitted,



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VERIFICATION OF COMPLAINT

I, Paul Melin, declare under penalty of perjury under the laws of the United States of America, and in accordance with 19 C.F.R. §§ 210.4 and 210.12(a) the following is true and correct:

1. I am Vice President, Intellectual Property, of Nokia Corporation, and am duly authorized to verify this complaint on behalf of complainants;
2. I have read the complaint and am aware of its contents;
3. The complaint is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needlessly increase in the cost of litigation;
4. To the best of my knowledge, information and belief founded upon reasonable inquiry, the claims and legal contentions of this complaint are warranted by existing law or a good faith argument for the extension, modification or reversal of existing law;
5. To the best of my knowledge, information and belief founded upon reasonable inquiry, the allegations and other factual contentions in the complaint have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

Executed on March 24, 2011

Paul Melin