

Exhibit 4

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**From:** Victoria Maroulis <victoriamaroulis@quinnemanuel.com>  
**Sent:** Tuesday, October 23, 2012 8:45 PM  
**To:** Victoria Maroulis; Hung, Richard S. J.; Robert Becher  
**Cc:** AppleMoFo; Samsung v. Apple; 'WH Apple Samsung NDCal Service'; Susan R. Estrich; Derek Shaffer  
**Subject:** RE: Apple v. Samsung (11-cv-1846) -- Depositions of Samsung's experts

I should add that this proposed schedule is premised on Apple waiving reply and oral argument as we have done with several motions to shorten. Please confirm. Thanks.

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**From:** Victoria Maroulis  
**Sent:** Tuesday, October 23, 2012 8:41 PM  
**To:** 'Hung, Richard S. J.'; Robert Becher  
**Cc:** 'AppleMoFo'; Samsung v. Apple; 'WH Apple Samsung NDCal Service'; Susan R. Estrich; Derek Shaffer  
**Subject:** RE: Apple v. Samsung (11-cv-1846) -- Depositions of Samsung's experts

Rich, we can do 6 pm Friday to avoid briefing the motion to shorten. Please confirm that this works and that we'll have a stipulated schedule.

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**From:** Hung, Richard S. J. [mailto:RHung@mofo.com]  
**Sent:** Tuesday, October 23, 2012 6:02 PM  
**To:** Victoria Maroulis; Robert Becher  
**Cc:** AppleMoFo; Samsung v. Apple; 'WH Apple Samsung NDCal Service'  
**Subject:** RE: Apple v. Samsung (11-cv-1846) -- Depositions of Samsung's experts

Vicki,

We propose that Samsung's response be due on Friday at noon, so that the Court has ample time to consider and rule on our request.

As we will be filing our motion tonight, please let us know if this response deadline is acceptable.

Rich

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**From:** Victoria Maroulis [mailto:victoriamaroulis@quinnemanuel.com]  
**Sent:** Tuesday, October 23, 2012 12:21 PM  
**To:** Hung, Richard S. J.; Robert Becher  
**Cc:** AppleMoFo; Samsung v. Apple; 'WH Apple Samsung NDCal Service'  
**Subject:** RE: Apple v. Samsung (11-cv-1846) -- Depositions of Samsung's experts

Rich,

Samsung opposes Apple's request for depositions of its experts. The Court's post-trial schedule does not contemplate depositions. If Apple insists on burdening the Court with motion practice, Samsung agrees to brief

this matter on shortened schedule and proposes that Apple file its motion today and that Samsung's response be due on Monday, October 29.

Vicki

**Victoria Maroulis**

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**From:** Hung, Richard S. J. [<mailto:RHung@mofo.com>]

**Sent:** Monday, October 22, 2012 10:38 AM

**To:** Victoria Maroulis; Robert Becher

**Cc:** AppleMoFo; Samsung v. Apple; 'WH Apple Samsung NDCal Service'

**Subject:** Apple v. Samsung (11-cv-1846) -- Depositions of Samsung's experts

Vicki & Rob:

Samsung's oppositions filed Friday include declarations from newly disclosed experts, new and previously undisclosed subjects for prior experts, and new factual claims by experts. As a result, Apple intends to take the depositions of Jerry Wind, Tulin Erdeem, Sam Lucente, Stephen Gray, and Michael Wagner.

Please respond by noon tomorrow with Samsung's unconditional commitment to provide depositions of these individuals by November 1. If we do not receive this commitment by this time, we will seek expedited relief from the Court to take these depositions. In light of the current November 9 deadline for replies, delay is not an option.

The following is a proposed schedule for the depositions:

- Jerry Wind, October 29, 2012, Philadelphia
- Tulin Erdeem, October 30, New York
- Michael Wagner, November 1, San Francisco
- Stephen Gray, October 29, San Francisco
- Sam Lucente, October 30, San Francisco

Rich

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