

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LEADER TECHNOLOGIES, INC., a
Delaware corporation,

Plaintiff-Counterdefendant,

v.

FACEBOOK, INC., a Delaware corporation,

Defendant-Counterclaimant.

Civil Action No. 08-862-JJF/LPS

**NON-PARTY STEPHEN DAWSON-
HAGGERTY'S OBJECTIONS AND
RESPONSES TO PLAINTIFF LEADER
TECHNOLOGIES, INC.'S NOTICE OF
DEPOSITION AND SUBPOENA**

Pursuant to Federal Rules of Civil Procedure 30 and 45, non-party STEPHEN DAWSON-HAGGERTY ("Mr. Dawson-Haggerty") hereby submits the following objections and responses to LEADER TECHNOLOGIES, INC.'s ("LTI" or "Plaintiff") Notice of Deposition and Subpoena.

I. PRELIMINARY STATEMENT.

The specific responses set forth below are for the purposes of discovery only.

A. Mr. Dawson-Haggerty's investigation and search for documents and things responsive to the requests are ongoing. Pursuant to Fed. R. Civ. P. 26(e), Mr. Dawson-Haggerty specifically reserves the right to supplement and amend these responses and, if necessary, to assert additional objections arising from further investigation.

B. Mr. Dawson-Haggerty's response to a particular request shall not be interpreted as implying that responsive documents and things exist or that Mr. Dawson-Haggerty acknowledges the appropriateness of the request.

C. The following responses are based on information reasonably available to Mr. Dawson-Haggerty as of the date of this response. Mr. Dawson-Haggerty's investigation is continuing and ongoing and Mr. Dawson-Haggerty expressly reserves the right to revise and/or supplement his responses.

II. GENERAL OBJECTIONS.

The following General Objections apply to each request and are hereby incorporated by reference into the individual response to each request, and shall have the same force and effect as if fully set forth in the individual response to each request.

1. Mr. Dawson-Haggerty objects to the time and to the location specified in the Notice of Deposition and Subpoena. Mr. Dawson-Haggerty will appear for a deposition, if at all, at a time and place to be agreed upon.

2. Mr. Dawson-Haggerty objects to Plaintiff's "Instructions" to the extent they seek to impose obligations beyond those permitted by the Federal Rules of Civil Procedure, the Local Rules of Court, or other applicable law.

3. Mr. Dawson-Haggerty objects to each request for documents to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, and/or any other applicable privilege or immunity.

4. Mr. Dawson-Haggerty objects to each request for documents to the extent it is phrased in a manner that would render it overly broad, vague or ambiguous, or would require subjective judgment or speculation on the part of Mr. Dawson-Haggerty. Mr. Dawson-Haggerty responds to these requests by construing them in light of the scope of the issues in this action.

5. Mr. Dawson-Haggerty objects to each request for documents to the extent it seeks to elicit information that is subject to a right of privacy under the relevant provisions of federal and state law.

6. Mr. Dawson-Haggerty objects to each request for documents to the extent it seeks to elicit third-party confidential information.

7. Mr. Dawson-Haggerty objects to each request for documents to the extent it purports to place an obligation on Mr. Dawson-Haggerty to obtain information that is as readily available to Plaintiff as it is to Mr. Dawson-Haggerty.

8. Mr. Dawson-Haggerty objects to each request for documents to the extent it calls for information not in the possession, custody or control of Mr. Dawson-Haggerty.

9. Mr. Dawson-Haggerty objects to each request for documents to the extent it is not properly limited in time.

III. OBJECTIONS TO DEFINITIONS.

1. Mr. Dawson-Haggerty objects to Plaintiff's definition of "Facebook," and "Defendant" as overly broad and vague and ambiguous, due at least to Plaintiff's inconsistent usage of the term throughout its document requests.

2. Mr. Dawson-Haggerty objects to Plaintiff's definition of "'761 Patent" and "Patent-in-Suit" as overly broad. Mr. Dawson-Haggerty shall construe the terms to mean United States Patent No. 7,139,761, entitled "Dynamic Association of Electronically Stored Information with Iterative Workflow Changes."

3. Mr. Dawson-Haggerty objects to Plaintiff's definition of "document" to the extent it seeks to define that term more broadly than allowed under the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence. Mr. Dawson-Haggerty shall construe the term in a manner consistent with said Rules.

IV. SPECIFIC OBJECTIONS AND RESPONSES.

DOCUMENT REQUEST NO. 1:

Any and all documents relating to your involvement in the development of Facebook.

RESPONSE TO DOCUMENT REQUEST NO. 1:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence. Mr. Dawson-Haggerty further objects to the term "involvement" as vague and ambiguous. Mr. Dawson-Haggerty further objects to the request's use of the term "Facebook" as vague and ambiguous, particularly as "Facebook" has

been defined by Plaintiff in such a way as to make this request unintelligible. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities.

DOCUMENT REQUEST NO. 2:

Any and all documents relating to Mark Zuckerberg's involvement in the development Facebook.

RESPONSE TO DOCUMENT REQUEST NO. 2:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence. Mr. Dawson-Haggerty further objects to this request on the ground that it is unintelligible as to the phrase "development Facebook." Mr. Dawson-Haggerty further objects to the term "involvement" as vague and ambiguous. Mr. Dawson-Haggerty further objects to the request's use of the term "Facebook" as vague and ambiguous, particularly as "Facebook" has been defined by Plaintiff in such a way as to make this request unintelligible. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities.

DOCUMENT REQUEST NO. 3:

Any and all documents relating to any business relationship between you and Mark Zuckerberg and/or Facebook.

RESPONSE TO DOCUMENT REQUEST NO. 3:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this Request on the ground that it is unintelligible, and vague and ambiguous as to which persons or entities are potentially parties to any “business relationship.” Mr. Dawson-Haggerty further objects to the term “business relationship” as vague and ambiguous. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence, as this request, to the extent Mr. Dawson-Haggerty is capable of interpreting its language, seeks documents that are neither relevant nor likely to lead to the discovery of admissible evidence as the subject of the request has no bearing on any issue in this action. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities.

DOCUMENT REQUEST NO. 4:

Any and all communication between you and Mark Zuckerberg concerning the development of Facebook.

RESPONSE TO DOCUMENT REQUEST NO. 4:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence. Mr. Dawson-Haggerty further objects to the request's use of the term "Facebook" as vague and ambiguous, particularly as "Facebook" has been defined by Plaintiff in such a way as to make this request unintelligible. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities.

DOCUMENT REQUEST NO. 5:

Any and all communication describing the Facebook source code and platform.

RESPONSE TO DOCUMENT REQUEST NO. 5:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence. Mr. Dawson-Haggerty further objects to the request's use of the term "Facebook" as vague and ambiguous, particularly as "Facebook" has been defined by Plaintiff in such a way as to make this request unintelligible. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession,

custody or control. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities.

DOCUMENT REQUEST NO. 6:

All source code relating to Facebook.

RESPONSE TO DOCUMENT REQUEST NO. 6:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence. Mr. Dawson-Haggerty further objects to the request's use of the term "relating to" as vague, ambiguous and unintelligible. Mr. Dawson-Haggerty further objects to the request's use of the term "Facebook" as vague and ambiguous, particularly as "Facebook" has been defined by Plaintiff in such a way as to make this request unintelligible. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities.

DOCUMENT REQUEST NO. 7:

Any and all documents relating to the origins and/or development of Facebook.

RESPONSE TO DOCUMENT REQUEST NO. 7:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request as overly broad and unduly burdensome, the burden of production vastly outweighing the nominal probative value responsive documents might have. Mr. Dawson-Haggerty further objects to this request as overly broad in that it is not reasonably calculated to lead to admissible evidence. Mr. Dawson-Haggerty further objects to the request's use of the term "Facebook" as vague and ambiguous, particularly as "Facebook" has been defined by Plaintiff in such a way as to make this request unintelligible. Mr. Dawson-Haggerty further objects to the term "origins" as vague and ambiguous. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control.

REQUEST NO. 8:

Any and all documents relating to Leader, Michael McKibben, and/or the '761 patent.

RESPONSE TO REQUEST NO. 8:

Mr. Dawson-Haggerty incorporates each of his General Objections herein by reference. Mr. Dawson-Haggerty further objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, the attorney work-product doctrine and/or other applicable privileges or immunities. Mr. Dawson-Haggerty further objects to the extent this request asks for documents outside of his possession, custody or control. Subject to and without waiving his objections, Mr. Dawson-Haggerty responds that, after a reasonable

search, he has not located non-privileged, responsive documents that were created prior to the filing of the Complaint in this action.

Dated: January 29, 2010

By: /s/ Elizabeth L. Stameshkin

Heidi L. Keefe (pro hac vice)
Mark R. Weinstein (pro hac vice)
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1160758/SF

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA CLARA

I am employed in the County of Santa Clara, State of California. I am over the age of 18 and not a party to the within action. My business address is 3000 EI Camino Real, Five Palo Alto Square, Palo Alto, CA 94306.

On January 29, 2010, I served the following document:

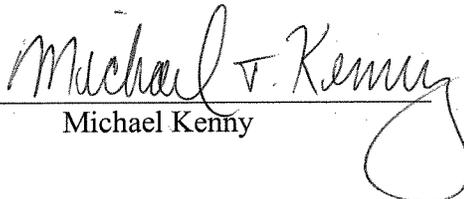
NON-PARTY STEPHEN DAWSON HAGGERTY'S OBJECTIONS AND RESPONSES TO PLAINTIFF LEADER TECHNOLOGIES, INC.'S NOTICE OF DEPOSITION AND SUBPOENA

on the interested parties in this action follows:

<p><u>BY E-MAIL:</u></p> <p>Paul J. Andre, Esq. Lisa Kobialka, Esq. James Hannah, Esq. King & Spalding 333 Twin Dolphin Drive, Suite 400 Redwood Shores, CA 94065</p> <p>pandre@kslaw.com lkobialka@kslaw.com jhannah@kslaw.com</p>	<p><u>BY E-MAIL:</u></p> <p>Philip A. Rovner, Esq. Potter Anderson & Corroon LLP P.O. Box 951 Wilmington, DE 19899-0951</p> <p>provner@potteranderson.com</p>
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[XX] BY ELECTRONIC MAIL: I am personally and readily familiar with the business practice of Cooley Godward Kronish LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed above.

I declare that I am employed in the office of a member of the bar of this Court at whose directions the service was made. I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on January 29, 2010 at Palo Alto, California.


Michael Kenny