

EXHIBIT 4

Alex Hu

From: Yohannan, Kristin L. [KYohannan@mofo.com]
Sent: Monday, March 26, 2012 6:21 PM
To: Diane Hutnyan
Cc: Samsung ITC; Apple-Samsung-796-Service; S&JSamsung796@steptoe.com; Reginald.Lucas@usitc.gov
Subject: RE: 796 Investigation: Regarding filing the 796 Deposition Transcripts Under Seal in Northern California

Counsel -

Apple has a proposed compromise to try to overcome the current issue the parties have with showing the 796 Investigation deposition transcripts to Judge Grewal (and possibly Judge Koh). Samsung stated on today's DCM call that it wanted to prove to Judge Grewal and/or Judge Koh that the ITC deposition transcripts have not been produced in the NDCal case. And, Samsung stated that it wanted to show Judge Grewal and/or Judge Koh that there is a technological nexus between the NDCal case and the 796 Investigation. Apple already offered to allow Samsung to submit the transcripts *in camera*. Samsung rejected this proposal on the grounds of "burden." In view of this, Apple is willing to agree to allow Samsung to show Judge Grewal and/or Judge Koh that the deposition transcripts are part of the 796 Investigation case and have no Bates numbers from the NDCal case by producing the first five pages of each of the transcripts you identified in your previous correspondence. It is unnecessary to show Judge Grewal and/or Judge Koh the entire deposition transcripts to prove this point. Moreover, Apple will stipulate to the fact that there is a technological nexus between the NDCal case and the 796 Investigation. If Samsung agrees to this compromise, Apple will agree to allow Samsung to file five pages from each of the deposition transcripts that were previously identified with its motion under seal rather than file them for *in camera* review.

Please let us know whether you agree to this compromise.

Best regards,
Kristin

From: Diane Hutnyan [mailto:dianehutnyan@quinnemanuel.com]
Sent: Monday, March 26, 2012 5:20 PM
To: Yohannan, Kristin L.
Cc: Samsung ITC; Apple-Samsung-796-Service; 'S&JSamsung796@steptoe.com'; 'Reginald.Lucas@usitc.gov'
Subject: 796 Inv: Regarding filing the 796 Deposition Transcripts Under Seal in Northern California

Kristin,

Here is our protective order from the Northern District. Who can see HC-AEO items is set forth starting on page 11.

Nothing in any of these transcripts cannot be reasonably protected by HC-AEO treatment.

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