

EXHIBIT 4

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 APPLE INC., a California
6 corporation,

7 Plaintiff,

8 vs.

CASE NO. 11-cv-01846-LHK

9 SAMSUNG ELECTRONICS CO.,
10 LTD., a Korean business
11 entity; SAMSUNG ELECTRONICS
12 AMERICA, INC., a New York
13 corporation; SAMSUNG
14 TELECOMMUNICATIONS AMERICA,
15 LLC, a Delaware limited
16 liability company,
17 Defendants.

18 _____/

19 C O N F I D E N T I A L
20 A T T O R N E Y S E Y E S O N L Y

21 VIDEOTAPED DEPOSITION OF BRIAN Q. HUPPI
22 REDWOOD SHORES, CALIFORNIA
23 TUESDAY, OCTOBER 18, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR.
25 CSR LICENSE NO. 9830
JOB NO. 42679

1 Foerster, representing Apple.

2

3

BRIAN Q. HUPPI,

4

having been sworn as a witness,

5

by the Certified Shorthand Reporter,

6

testified as follows:

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EXAMINATION BY MR. MACK

10

MR. MACK: Q. Mr. Huppi, could you please

11

state your name and address for the record.

12

A Sure. It's Brian Quentin Huppi. My address

13

is 262 Rutledge Street in San Francisco, California.

14

Q Have you been deposed before?

15

A Yes.

16

Q How many times?

17

A Once.

18

Q And do you remember what case that was in?

19

A It was a case involving Motorola. I don't

20

remember the case number.

21

Q Okay. And was -- were you deposed as your

22

role as an inventor on any patent asserted -- asserted

23

in that case?

24

A Yes.

25

Q Okay. Do you remember which patent it was?

1 MR. MACK: Q. Do you recognize this -- this
2 document?

3 A Yes. I believe I received an e-mail copy of
4 it.

5 Q Okay. And is this subpoena the reason why
6 you are testifying here today?

7 MR. BARTLETT: Objection; vague.

8 THE WITNESS: I believe that's why I'm here.

9 MR. MACK: Okay.

10 Q Do you see that the subpoena also asks you to
11 produce documents in connection with this case?

12 A Yes.

13 Q And did you perform a search for documents in
14 connection with this case?

15 A Yes, but I didn't find any.

16 Q Okay. Did you perform a search for documents
17 in connection with the previous case that you were
18 deposed in?

19 A Yes. I didn't find any.

20 Q Okay. Do you maintain a computer at your
21 house with work relating to Apple?

22 MR. BARTLETT: Objection; vague.

23 THE WITNESS: I have a home computer, but it
24 doesn't have any Apple materials. That was all left
25 behind at Apple.

1 MR. MACK: Okay.

2 Q How about e-mail correspondence with Apple?
3 Do you have any e-mail correspondence on your home
4 computer?

5 MR. BARTLETT: Same objection.

6 THE WITNESS: I have --

7 MR. BARTLETT: And compound.

8 THE WITNESS: -- I do have some e-mails
9 with -- with folks at Apple. Some are friends or
10 colleagues. Some are with -- associated with some
11 contracting work I did with Apple since I left Apple.

12 MR. MACK: Okay.

13 Q And have you retained any documents relating
14 to your work at Apple after you left Apple?

15 MR. BARTLETT: Objection; vague.

16 THE WITNESS: They would only be documents
17 related to work I did after I left Apple.

18 MR. MACK: Okay.

19 Q Did you personally conduct the search for
20 documents, or did someone else conduct the search on
21 your behalf?

22 A I searched for any documents that I might
23 have personally.

24 Q Okay. And you found none; correct?

25 A Correct.

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CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO HOWARD, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings which took place;

That I am a disinterested person to the said action.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of October, 2011.

ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830