

# EXHIBIT 4

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APPLE INC.

17  
18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN JOSE DIVISION

21 APPLE INC., a California corporation,

22 Plaintiff,

23 v.

24 SAMSUNG ELECTRONICS CO., LTD., a  
Korean corporation; SAMSUNG  
25 ELECTRONICS AMERICA, INC., a New  
York corporation; and SAMSUNG  
26 TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited liability company,

27 Defendants.  
28

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Case No. 11-cv-01846-LHK

**APPLE INC.'S REQUESTS FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS RELATING TO  
APPLE'S MOTION FOR A  
PRELIMINARY INJUNCTION – SET  
ONE**

1 APPLE INC. (“Apple” or “Plaintiff”) hereby requests, pursuant to Rules 26 and 34 of the  
2 Federal Rules of Civil Procedure, that SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG  
3 ELECTRONICS AMERICA, INC.; and SAMSUNG TELECOMMUNICATIONS AMERICA,  
4 LLC, (“Defendants”) respond to Apple’s Requests for Production of Documents Relating to  
5 Apple’s Motion for a Preliminary Injunction. Apple requests that Defendants produce for  
6 inspection and copying the documents and things set forth below at the offices of Morrison &  
7 Foerster, LLP, 425 Market St., San Francisco, CA 94105-2482 within twenty-three (23) days, or  
8 such other time as the parties agree or the Court orders.

### 9 DEFINITIONS

10 The words and phrases used in these Requests shall have the meanings ascribed to them  
11 under the Federal Rules of Civil Procedure and the Local Rules of the United States District  
12 Court for the Northern District of California. In addition, the following terms shall have the  
13 meanings set forth below whenever used in any Request.

14 1. “You” and/or “your” mean Defendants and all predecessors, successors,  
15 predecessors-in-interest, successors-in-interest, subsidiaries, divisions, parents, and/or affiliates,  
16 past or present, any companies that have a controlling interest in Defendants, and any current or  
17 former employee, officer, director, principal, agent, consultant, sales representative, or attorney  
18 thereof.

19 2. “Apple” means Apple Inc.

20 3. “Products at Issue” means the Samsung Galaxy S 4G, Infuse 4G, Droid Charge,  
21 and Galaxy Tab 10.1, as released anywhere in the world.

22 4. “Exterior Design” means a device’s casing, screen, bezel, buttons, ports, speaker,  
23 and speaker slots, and all hardware, insignia, or ornamentation thereon.

24 5. “Patents at Issue” means U.S. Design Patent Nos. D618,677, D593,087, and  
25 D504,889, and U.S. Patent No. 7,469,381.

26 6. “Document(s)” has the broadest possible meaning permitted by Federal Rules of  
27 Civil Procedure Rules 26 and 34 and the relevant case law. “Document(s)” also includes all  
28 drafts or non-final versions, alterations, modifications, and amendments to any of the foregoing.



1 **REQUEST NO. 2:**

2 Documents relating to the existence of and/or work conducted by any group within  
3 Defendants that analyzes, analyzed, considers, considered, copies, copied, compares, or compared  
4 any Apple product or product feature in developing one or more of the Products at Issue.

5 **REQUEST NO. 3:**

6 Documents relating to competition between Apple and Samsung products, including each  
7 version of the iPhone or iPad and any of the Products at Issue.

8 **REQUEST NO. 4:**

9 Documents sufficient to identify the respective markets of each of the Products at Issue.

10 **REQUEST NO. 5:**

11 Documents sufficient to identify the respective market shares of each of the Products at  
12 Issue.

13 **REQUEST NO. 6:**

14 Documents sufficient to identify the respective market share of each product that  
15 competes with the Products at Issue.

16 **REQUEST NO. 7:**

17 Documents sufficient to identify all projections you have reviewed or considered as to  
18 what the respective market share of each of the Products at Issue, and each product that competes  
19 with each of the Products at Issue, is likely to be at any future point.

20 **REQUEST NO. 8:**

21 Documents and things you allege are prior art to the Patents at Issue.

22 Dated: July 12, 2011

MORRISON & FOERSTER LLP

23  
24  
25 By: /s/ Richard S.J. Hung  
RICHARD S.J. HUNG  
26 Attorneys for Defendant  
27 APPLE INC.  
28

1 **CERTIFICATE OF SERVICE**

2 I, Deok Keun Matthew Ahn, hereby certify that on July 12, 2011, true and correct  
3 copies of the foregoing document were served on the following counsel of record at the  
4 addresses and in the manner indicated:

5 **VIA ELECTRONIC MAIL**

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I declare under the penalty of perjury that the foregoing is true and correct.

/s/ Deok Keun Matthew Ahn  
Deok Keun Matthew Ahn