

# EXHIBIT 4

## Melissa Chan

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**From:** Melissa Chan  
**Sent:** Thursday, December 08, 2011 11:54 AM  
**To:** 'Mazza, Mia'; Diane Hutnyan  
**Cc:** Samsung v. Apple; 'AppleMoFo'; 'sam.maselli@wilmerhale.com'; 'calvin.walden@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'  
**Subject:** RE: Apple v. Samsung: Discovery Correspondence - Stipulation to Proceed on Shortened Time

Dear Mia,

As we have stated before, Samsung is agreeable to producing the categories of documents set forth below, subject to Samsung's objections as discussed in its written responses and during prior meet and confer calls, thus obviating any need for motion practice. Due to technical constraints, logistical and translation issues, limited availability issues due to the upcoming holiday season, and the sheer volume of materials being demanded by Apple for expedited production, we have inserted more feasible dates into the list in your email below, as follows:

- Samsung will make a good-faith, expedited effort to locate and substantially complete, by December 31, 2011, its production of "Apple" and survey documents,
- Samsung will make a good-faith, expedited effort to locate and substantially complete, by December 31, 2011, its production of certain categories of source code as described in your December 6, 2011 letter;
- Samsung will make a good-faith, expedited effort to locate and substantially complete, by January 6, 2012, its production of sketchbooks and physical models for Galaxy phone and tablet products; and
- Samsung will make a good-faith, expedited effort to locate and substantially complete, by January 6, 2012, its production of CAD files created in connection with the design of Galaxy phone and tablet products.

To avoid the need for any motion practice on these same issues by Samsung against Apple, please confirm by the close of business today that Apple will make the same good-faith effort to produce these same categories of documents (as requested by Samsung) by the dates listed above.

Thanks,  
Melissa

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**From:** Mazza, Mia [<mailto:MMazza@mofo.com>]  
**Sent:** Wednesday, December 07, 2011 9:31 PM  
**To:** Diane Hutnyan  
**Cc:** Samsung v. Apple; AppleMoFo; [sam.maselli@wilmerhale.com](mailto:sam.maselli@wilmerhale.com); [calvin.walden@wilmerhale.com](mailto:calvin.walden@wilmerhale.com); [peter.kolovos@wilmerhale.com](mailto:peter.kolovos@wilmerhale.com)  
**Subject:** FW: Apple v. Samsung: Discovery Correspondence - Stipulation to Proceed on Shortened Time

Diane --

As we discussed on today's call and in previous correspondence, please also let me know whether -- if motion practice does proceed -- Samsung agrees to the motion being heard on shortened time, as follows:

Opening brief: Thursday, December 8, 2011  
Opposition brief: Monday, December 12, 2011

Reply brief: Wednesday, December 14, 2011  
Hearing: on or about Friday, December 16, 2011

As we've discussed, Judge Grewal's calendar reflects that he is unavailable for hearing during the week of December 19, 2011.

Regards,

**Mia Mazza**  
**Morrison & Foerster LLP**  
**San Francisco**  
**(415) 268-6024 office**  
**(415) 302-6583 mobile**  
**(415) 268-7522 fax**

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**From:** Mazza, Mia  
**Sent:** Wednesday, December 07, 2011 8:23 PM  
**To:** 'dianehutnyan@quinnemanuel.com'  
**Cc:** 'samsungv.apple@quinnemanuel.com'; AppleMoFo: 'sam.maselli@wilmerhale.com'; 'calvin.walden@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'

**Subject:** Apple v. Samsung: Discovery Correspondence - Written Confirmation Needed to Avoid Motion Practice

<<2011-12-07 Ltr Mazza to Hutnyan re MTC.pdf>>

Hi Diane,

Attached please find discovery correspondence regarding the written commitment Samsung will need to make by noon Pacific tomorrow (December 8, 2011) to avoid motion practice at this time.

I have attached the referenced correspondence as well.

Regards,

**Mia Mazza**  
**Morrison & Foerster LLP**  
**San Francisco**  
**(415) 268-6024 office**  
**(415) 302-6583 mobile**  
**(415) 268-7522 fax**

<<2011-12-06 Ltr Mazza to Chan re Source Code.pdf>> <<2011-12-06 Ltr Mazza to Ducca re Expedited Design Production.pdf>> <<2011-12-05 Ltr Mazza to Kassabian re M&C and MTC.pdf>>

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