

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 10-CIV-20718-COOKE/BANDSTRA

ALBERT SEGAL, and
MARIANNA CHAPAROVA,

Plaintiffs,

- vs. -

AMAZON.COM, INC.,

Defendant.

**DEFENDANT AMAZON.COM, INC.'S OBJECTIONS TO PLAINTIFFS' NOTICE OF
TAKING DEPOSITION PURSUANT TO RULE 30(b)(6)**

Defendant Amazon.com, Inc. ("Amazon") hereby serves the following objections to Plaintiffs' Notice of Taking Deposition Pursuant to Rule 30(b)(6) ("Notice")¹:

Deposition Topics: Amazon's management, operational, and financial matters, Amazon's SEC filings, and matters related to Plaintiffs' Amended Complaint.

Objections to Deposition Topics: Amazon objects to the topics in Plaintiffs' Notice on the ground and to the extent that they are vague, ambiguous, unclear, and wildly overbroad, and because they do not describe with reasonable particularity the matters for examination, as required by Fed.R.Civ.P. 30(b)(6). Amazon also objects to the topics in Plaintiffs' Notice on the ground and to the extent that they are not reasonably calculated to lead to the discovery of admissible evidence in that they seek information that goes way beyond the claims or defenses framed by the well-pled pleadings in this case. As framed, these topics include virtually

¹ Plaintiffs never actually served a formal Notice of Taking Deposition; rather, Plaintiffs sent multiple emails to Amazon's counsel requesting a deposition of Amazon's corporate representative, in which Plaintiffs listed and subsequently repeatedly modified their deposition topics. For that reason alone, Plaintiffs' "Notice" is deficient.

everything about the company, on every level of detail, regardless of whether the information has anything to do with this case. Amazon has no reasonable way of identifying a representative (or even multiple representatives) that can even begin to testify as to all of the matters identified in Plaintiffs' Notice. Amazon also specifically objects to the topics in Plaintiffs' Notice to the extent Plaintiffs intend to seek information related to Amazon's other customers or other sellers on the Amazon Marketplace, since that information is not reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Amazon will agree to produce a witness for deposition who will be prepared to testify as to matters known to Amazon related specifically to Plaintiffs' seller account in the Amazon Marketplace.

Dated: December 22, 2010

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Counsel for Defendant Amazon.com, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2010, I served the foregoing document via E-Mail and U.S. Mail on the individuals identified on the Service List below.

/s/ David B. Esau
David B. Esau

SERVICE LIST

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