

EXHIBIT 4

From: Greg Bonifield <gregbonifield@quinnemanuel.com>
Sent: Thursday, April 19, 2012 2:21 PM
To: Haskett, Christine
Cc: AppleCov; Apple Moto Weil; Moto-Apple-SDFL
Subject: RE: Motorola v. Apple (FL)

Christine,

Your email states that “it appears that the parties are at least in agreement that the current deadlines are going to need to get extended.” It is not clear to us what agreement you are referring to. Under the extension Motorola agreed to, which the Court has already entered, the close of fact discovery is May 4. We need to schedule the depositions so that they take place prior to that date.

There is no reason counsel cannot find time for these depositions. Indeed, Apple continues to schedule depositions that it wants to take for dates before May 4, including multiple depositions of Rovi employees. Apple also will have had more than enough time to schedule depositions around any scheduling conflicts for the engineers that Apple decides to designate to testify regarding the Rule 30(b)(6) topics at issue. That is particularly true considering that the Court initially gave Apple just ten days to schedule those depositions. We agreed to allow the depositions to be scheduled after that time, but there was no suggestion on Apple’s part that it would try to schedule the depositions after the May 4 close of discovery, and we would not have agreed to such a delay.

Thus, please provide dates for the 30(b)(6) depositions prior to May 4, and please provide those dates to us immediately. If Apple refuses to do so, we will seek relief from the Court.

Regards,

Greg

From: Haskett, Christine [<mailto:chaskett@cov.com>]
Sent: Wednesday, April 18, 2012 12:32 PM
To: Greg Bonifield
Cc: AppleCov; Apple Moto Weil; Moto-Apple-SDFL
Subject: RE: Motorola v. Apple (FL)

Greg,

Notwithstanding the disagreements between the parties over various case scheduling issues, it appears that the parties are at least in agreement that the current deadlines are going to need to get extended. Given the schedules of the engineers, combined with the level of activity in the Illinois case, we are going to need to schedule these depositions for dates after May 4. I suggest that we wait to see how the scheduling issues are resolved, at which time we will work with you to schedule dates for the depositions.

Christine

From: Greg Bonifield [<mailto:gregbonifield@quinnemanuel.com>]
Sent: Wednesday, April 18, 2012 8:38 AM
To: Haskett, Christine
Cc: AppleCov; Apple Moto Weil; Moto-Apple-SDFL
Subject: Motorola v. Apple (FL)

Christine,

We still have not heard back from you in response to my email of Monday, April 16, or Matt Korhonen's email of yesterday morning, April 17, regarding the scheduling of 30(b)(6) witnesses. I have attached that correspondence for your convenience. As discussed in those emails, we have had conversations with you about these depositions previously. The Court ordered Apple to provide 30(b)(6) witnesses on the email notification function for iOS 5 and on the source code for the webmail functionality for MobileMe. In addition, based on Apple's earlier agreement, because the Court compelled Apple to provide a 30(b)(6) witness on email notifications, it also now needs to provide a witness on notifications (or "alerts") on Apple's iOS devices for text messages. Accordingly, please let me know by the end of today about the scheduling of these depositions or we will plan to move the court for relief at the end of this week.

Regards,
Greg