

EXHIBIT 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: APPLE IPHONE 3G AND 3GS
"MMS" MARKETING AND SALES
PRACTICES LITIGATION

THIS DOCUMENT RELATES TO ALL
CASES

CIVIL ACTION
MDL No: 2116

SECTION "J"

JUDGE BARBIER

MAGISTRATE JUDGE WILKINSON

**NOTICE TO DEFENDANT AT&T MOBILITY OF DEPOSITION
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

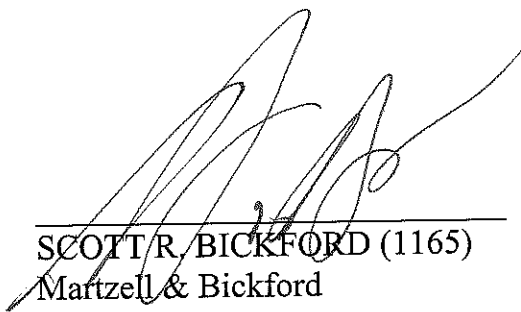
To: AT&T Mobility
Through Counsel of record
Gary J. Russo, Esq.
Carmen M. Rodriguez, Esq.
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P. O. Drawer 3408
Lafayette, LA 70502-3408

Kathleen Taylor Sooy
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1001 Pennsylvania Avenue N.W.
Washington, DC 20004

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition upon oral examination of AT&T Mobility (AT&T) as to matters set forth in the attached Schedule of Topics, on October 21, 2010, at 10:00 a.m. EST, at Crowell & Moring LLP, 1001 Pennsylvania Avenue N.W. Washington, DC 20004, or at such other time or location as may be agreed by the

parties. The deposition will be conducted before a notary public or other person authorized by law to administer oaths, and will be recorded by stenographic means and/or by videotape.

October 1, 2010



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SCHEDULE OF TOPICS

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, AT&T shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, who must testify about information known or reasonably available to AT&T related to the following topics:

1. The policies and procedures for sale of iPhone and presentation to buyers of the AT&T service contract contract at AT&T and Apple retail stores;
2. The policies and procedures for sale of iPhone and presentation to buyers of the AT&T service contract on the internet;
3. Information concerning the names of customers, locations, and outcomes of arbitrations between iPhone customers and AT&T that have taken place pursuant to the AT&T service contract within the last 3 years.
4. The drafting, evolution, and content of AT&T arbitration clause over the last five years, whether for AT&T Wireless or AT&T Mobility, including the locations where the clauses were drafted.
5. Discussions between AT&T and Apple regarding the exclusive arrangement of using AT&T as the sole service provider for iPhones.
6. Discussions between AT&T and Apple regarding AT&T's arbitration clause.
7. The policies and procedures for activation of buyers' iPhones and agreement to AT&T's service agreement via either computer, telephone, or both.

8. The number of class action complaints filed against AT&T, the number of consumers alleged to be represented in those class actions, in response to which AT&T has argued arbitration should be compelled, and the number of class actions AT&T has filed against its customers.