

# Exhibit 4

**From:** Andrea P Roberts  
**Sent:** Thursday, January 28, 2010 11:16 AM  
**To:** 'Andrew Spangler'; 'David Pridham'; 'Patrick Anderson'; John Bustamante; 'Marc Fenster'; 'Adam Hoffman'; 'Andrew Weiss'; Alex Giza; 'Stan Thompson'; 'Debera Hepburn'; 'lizwiley@wileyfirm.com'; 'kipglasscock@hotmail.com'; alan@alanbrookspc.com  
**Cc:** Brian Cannon; David Perlson; PA Advisors v. Google; 'Melissa Smith'; 'Gil Gillam'; White, Jason; Yovits, Steven; Rooklidge, William; Sherwin, Scott; jdoan@haltomdoan.com  
**Subject:** RE: PA Advisors v. Google - Expert discovery

Counsel:

As a follow-up to the email below, if there are additional experts that will be offering rebuttal opinions on Plaintiff's behalf (for example rebutting Dr. Peters' or Mr. Mossinghoff's reports), please provide dates on which they are available for deposition so that we can get them on the schedule. Defendants' rebuttal experts, whose reports are not due until February 1, are already accounted for in this proposed schedule.

Additionally, if you have any comments about the proposed schedule at this point, please let us know so we can sort them out as these deposition dates are coming up quickly.

Thank you,

Andrea Pallios Roberts  
Quinn Emanuel Urquhart Oliver & Hedges, LLP  
555 Twin Dolphin Drive, Suite 560  
Redwood Shores, CA 94065  
Direct: (650) 801-5023  
Main Phone: (650) 801-5000  
Main Fax: (650) 801-5100  
E-mail: [andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com)  
Web: [www.quinnemanuel.com](http://www.quinnemanuel.com)

---

**From:** Andrea P Roberts  
**Sent:** Wednesday, January 27, 2010 4:54 PM  
**To:** 'Andrew Spangler'; 'David Pridham'; 'Patrick Anderson'; John Bustamante; 'Marc Fenster'; 'Adam Hoffman'; 'Andrew Weiss'; Alex Giza; 'Stan Thompson'; 'Debera Hepburn'; 'lizwiley@wileyfirm.com'; 'kipglasscock@hotmail.com'; alan@alanbrookspc.com  
**Cc:** Brian Cannon; David Perlson; PA Advisors v. Google; 'Melissa Smith'; 'Gil Gillam'; White, Jason; Yovits, Steven; Rooklidge, William; Sherwin, Scott; jdoan@haltomdoan.com  
**Subject:** PA Advisors v. Google - Expert discovery

Counsel,

The parties have tried to schedule a meet and confer regarding expert deposition scheduling, but have been unable to do so. In light of the fact that expert depositions must be completed by February 19, the parties cannot delay any longer and have any hope of completing all of the depositions by that time. Accordingly, Defendants propose the schedule below. Where a single expert offered different reports articulating different

opinions against Google and Yahoo, we believe that each Defendant is entitled to a full seven-hour day of deposition of that expert, and have laid out the schedule accordingly.

Feb. 2 – Deposition of Dr. Becker by Yahoo in Austin, TX  
Feb. 3 – Deposition of Dr. Becker by Google in Austin, TX  
Feb. 5 – Deposition of Mr. Ugone by Plaintiff in Dallas  
Feb. 8 – Deposition of Dr. Peters by Plaintiff in Quinn Emanuel’s Redwood Shores office  
Feb. 9 – Deposition of Mary Woodford by Plaintiff in Washington, DC  
Feb. 10 – Deposition of Dr. Rhyne by Google in Austin, TX  
Feb. 11 – Deposition of Dr. Rhyne by Yahoo in Austin, TX  
Feb. 11 or 12 – Deposition of Mr. Mossinghoff by Plaintiff in Washington, DC  
Feb. 16 – Deposition of James Allan in Boston  
Feb. 17 – Deposition of Dr. Fox by Plaintiff in Virginia

The depositions need to take place in this general order such that, for example, Dr. Becker’s deposition takes place prior to the depositions of the experts rebutting his reports and Dr. Rhyne’s deposition takes place prior to the depositions of the experts rebutting his reports.

Andrea Pallios Roberts  
Quinn Emanuel Urquhart Oliver & Hedges, LLP  
555 Twin Dolphin Drive, Suite 560  
Redwood Shores, CA 94065  
Direct: (650) 801-5023  
Main Phone: (650) 801-5000  
Main Fax: (650) 801-5100  
E-mail: [andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com)  
Web: [www.quinnemanuel.com](http://www.quinnemanuel.com)