

# Exhibit 4

# Vinson&Elkins

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March 11, 2011

## **By Email**

Ms. Shelley K. Mack  
Fish & Richardson P.C.  
500 Arguello Street, Suite 500  
Redwood City, California 94063

Re: *Northeastern Univ. and Jarg Corp. v. Google Inc.*, Case No. 2:07-CV-486-CE (E.D. Tex.): Trial Coordination

Dear Shelley:

There are a number of housekeeping items that we should address in light of the upcoming trial date.

First, Plaintiffs intend to designate Vincent Lembo and Kenneth Baclawski as their corporate representatives for Northeastern University and Jarg Corporation respectively at trial.

Second, Plaintiffs propose that the parties enter into the following agreements, which we believe would assist both sides in their trial preparations:

1. The parties agree to disclose a list of all the witnesses they will actually call in their case-in-chief two weeks before trial (*i.e.*, Monday, March 21, 2011).
2. The parties agree to disclose 24 hours in advance the witness(es) they intend to call at trial the next day.
3. The parties agree to exchange any graphics or demonstratives by 9:00 p.m. CST the night before the party intends to use them during trial the next day.
4. The parties agree to jointly request that the Court allow each side up to 5 minutes per day of trial for interim summaries, which could be used anytime after a witness is done testifying.

Please let us know whether Google is amenable to the above proposals.

Third, the parties should arrange times to meet and confer on the motions in limine and objections to the exhibit lists and deposition designations to determine if we can resolve any of these issues by agreement. Plaintiffs propose 3:00 p.m. CST on March 17, 2011, for the motions in limine and 3:00 p.m. CST on March 21, 2011, for the exhibit lists and deposition designations.

Finally, Plaintiffs note that two of the newly-identified individuals on Google's "amended" witness list, Jim Belanger and Anthony Pirri, are not currently employees of Northeastern University or Jarg Corporation. Plaintiffs do not control them, and we do not intend to ask them to appear voluntarily at trial.

I look forward to hearing back from you promptly on these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole E. Glauser", with a long horizontal flourish extending to the right.

Nicole E. Glauser

cc: Counsel of Record