

EXHIBIT 4

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 APPLE INC., a California
6 corporation,

7 Plaintiff,

8 vs. CASE NO. 11-cv-01846-LHK

9 SAMSUNG ELECTRONICS CO.,
10 LTD., a Korean business
11 entity; SAMSUNG ELECTRONICS
12 AMERICA, INC., a New York
13 corporation; SAMSUNG
14 TELECOMMUNICATIONS AMERICA,
15 LLC, a Delaware limited
16 liability company,
17 Defendants.

18 _____/

19 C O N F I D E N T I A L
20 A T T O R N E Y S E Y E S O N L Y
21

22 VIDEOTAPED DEPOSITION OF BRIAN Q. HUPPI
23 REDWOOD SHORES, CALIFORNIA
24 TUESDAY, OCTOBER 18, 2011
25

26 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR.
27 CSR LICENSE NO. 9830
28 JOB NO. 42679

1 Foerster, representing Apple.

2
3 BRIAN Q. HUPPI,
4 having been sworn as a witness,
5 by the Certified Shorthand Reporter,
6 testified as follows:
7
8

9 EXAMINATION BY MR. MACK

10 MR. MACK: Q. Mr. Huppi, could you please
11 state your name and address for the record.

12 A Sure. It's Brian Quentin Huppi. My address
13 is 262 Rutledge Street in San Francisco, California.

14 Q Have you been deposed before?

15 A Yes.

16 Q How many times?

17 A Once.

18 Q And do you remember what case that was in?

19 A It was a case involving Motorola. I don't
20 remember the case number.

21 Q Okay. And was -- were you deposed as your
22 role as an inventor on any patent asserted -- asserted
23 in that case?

24 A Yes.

25 Q Okay. Do you remember which patent it was?

1 MR. MACK: Q. Do you recognize this -- this
2 document?

3 A Yes. I believe I received an e-mail copy of
4 it.

5 Q Okay. And is this subpoena the reason why
6 you are testifying here today?

7 MR. BARTLETT: Objection; vague.

8 THE WITNESS: I believe that's why I'm here.

9 MR. MACK: Okay.

10 Q Do you see that the subpoena also asks you to
11 produce documents in connection with this case?

12 A Yes.

13 Q And did you perform a search for documents in
14 connection with this case?

15 A Yes, but I didn't find any.

16 Q Okay. Did you perform a search for documents
17 in connection with the previous case that you were
18 deposed in?

19 A Yes. I didn't find any.

20 Q Okay. Do you maintain a computer at your
21 house with work relating to Apple?

22 MR. BARTLETT: Objection; vague.

23 THE WITNESS: I have a home computer, but it
24 doesn't have any Apple materials. That was all left
25 behind at Apple.

1 MR. MACK: Okay.

2 Q How about e-mail correspondence with Apple?
3 Do you have any e-mail correspondence on your home
4 computer?

5 MR. BARTLETT: Same objection.

6 THE WITNESS: I have --

7 MR. BARTLETT: And compound.

8 THE WITNESS: -- I do have some e-mails
9 with -- with folks at Apple. Some are friends or
10 colleagues. Some are with -- associated with some
11 contracting work I did with Apple since I left Apple.

12 MR. MACK: Okay.

13 Q And have you retained any documents relating
14 to your work at Apple after you left Apple?

15 MR. BARTLETT: Objection; vague.

16 THE WITNESS: They would only be documents
17 related to work I did after I left Apple.

18 MR. MACK: Okay.

19 Q Did you personally conduct the search for
20 documents, or did someone else conduct the search on
21 your behalf?

22 A I searched for any documents that I might
23 have personally.

24 Q Okay. And you found none; correct?

25 A Correct.

1 CERTIFICATE OF REPORTER

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3
4 I, ANDREA M. IGNACIO HOWARD, hereby certify
5 that the witness in the foregoing deposition was by me
6 duly sworn to tell the truth, the whole truth, and
7 nothing but the truth in the within-entitled cause;
8

9 That said deposition was taken in shorthand
10 by me, a Certified Shorthand Reporter of the State of
11 California, and was thereafter transcribed into
12 typewriting, and that the foregoing transcript
13 constitutes a full, true and correct report of said
14 deposition and of the proceedings which took place;
15

16 That I am a disinterested person to the said
17 action.
18

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 19th day of October, 2011.
21

22 _____
23 ANDREA M. IGNACIO HOWARD, RPR, CCRR, CLR, CSR No. 9830
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